

# **EXHIBIT J**

**WOLLMUTH MAHER & DEUTSCH LLP**

500 FIFTH AVENUE  
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TELEPHONE (212) 382-3300  
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April 9, 2008

**BY E-MAIL AND**  
**FIRST CLASS MAIL**

Julie Rodriguez Aldort, Esq.  
Butler Rubin Saltarelli & Boyd LLP  
70 West Madison, Suite 1800  
Chicago, Illinois 60602

Re: AIU Insurance Company v. TIG Insurance Company,  
Case No. 07-cv-7052 (SHS)

Dear Julie:

Thank you for taking the time to speak with me on Monday, April 7, 2008 regarding certain document discovery issues. Below I seek to confirm and memorialize our discussions to avoid any future misunderstandings:

1. Inspection Documents. I asked you to confirm that TIG has produced all documents that it copied during TIG's 2007 inspection of AIU's files. You indicated that TIG has produced such materials in their entirety. I also asked you to designate the bates ranges for such documents in your production as it is unclear from the TIG production which documents were copied during the inspection. You indicated that you believed that you would be able to provide such information to me. I also expressed my surprise that TIG has produced virtually no internal documents related to the inspection, including correspondence between the auditors as well as the auditors' notes from the inspection. See Document Requests 1(e) and 1(f). You indicated that TIG will likely supplement its production with its auditors' notes but that TIG is asserting that internal correspondence between its auditors is privileged under the work product doctrine. I expressed my disagreement with this designation as the auditors are not attorneys and their inspection of AIU's files constitutes a bedrock claims function rather than litigation activity. Please confirm that TIG is not producing its internal correspondence relating to its audit of AIU, so that AIU may petition the Court for the production of such materials. Also, please confirm when TIG will be in a position to supplement its production with its audit notes.

2. Claims Documents. I asked you to confirm that TIG has produced all documents from its assumed reinsurance claims file relating to the Foster Wheeler claim that AIU has

submitted to TIG. I expressed my surprise that, once again, TIG has produced virtually no internal documents of substance related to the assumed claim. You indicated that TIG's assumed claims file was relatively small given that it was only opened in early 2007 and that most of the claims file was subject to work product doctrine protection given that when TIG received communications from AIU in January 2007 regarding the Foster Wheeler claim, it invoked the work product doctrine as to internal claims correspondence. I indicated my skepticism with this approach and asked you to reconsider making some of your basic claims handling documents available for production, especially since it appears that these documents were not prepared by attorneys or distributed to them and that such materials reflect basic claims functions. You indicated that TIG would be unlikely to reconsider these designations.

3. Reserving Documents. As you know, TIG has asserted as an affirmative defense that AIU's purported late notice precluded TIG from setting appropriate reserves under the Reinsurance Agreements. See Answer, Third Affirmative Defense. Nonetheless, TIG has produced hardly any documents relating to this defense, notwithstanding AIU's requests for such documents. See Document Requests Nos. 7 & 9. You advised me that TIG has produced all documents responsive to its reserving defense, including applicable guidelines for the posting of its reserves as well as TIG's subsequent reserving of the Foster Wheeler claims. You also advised me that TIG did not maintain additional documents responsive to our requests or its reserving defense.

4. Redactions. I expressed my concerns with TIG's approach to the redaction of documents in its production, including the following:

a. It appears that TIG is, at times, redacting the "to/from/cc/re" information from documents so that the withheld document does not contain this basic information. I referred you to an example of such a document. See, e.g., TIG 014284. I indicated that such basic materials are not privileged, except in the unusual situation where the entry in the "cc" line actually requested or indicated legal advice. You indicated that you would consider our request to provide such materials. My understanding is that TIG is reviewing whether it will supplement its production in all instances where it has redacted such information. Please let me know if and when TIG will provide such materials.

b. I indicated that there are instances where TIG has redacted information yet the document does not appear anywhere on the privilege or redaction logs submitted by TIG. I directed you to a couple of examples of such documents, which you asked me to indicate in my letter. See, e.g., TIG 014592 & 014595. (I also directed you to another document, which we were ultimately able to resolve insofar as it had been logged). Please note that the documents identified above are for illustrative purposes and do not represent all potential redactions that, for some reason, failed to make it on to TIG's redaction log. In sum, AIU requests that TIG log all instances where it is asserting that a document should be redacted and that TIG sets forth a basis for all claimed redactions. Please advise us when we should expect a supplemental redaction log.

c. I inquired whether TIG may be redacting certain information without a proper basis. More specifically, AIU understands that certain materials may be redacted to the extent these materials reference "other insurers or reinsurers" or where they indicate privileged information (*i.e.*, on the basis of the attorney client privilege or the work-product doctrine). However, the parties have not agreed to redact documents on any other grounds. Accordingly, I inquired whether TIG has redacted documents for reasons other than privilege or "other insurer/reinsurer" information. Based on your response, my understanding is that TIG has not redacted information besides for these two reasons. If I am incorrect in this understanding, please let me know as soon as possible.

d. I indicated that there appear to be instances where TIG's invocation of privilege has no basis in law. For instance, in documents beginning with the bates label TIG 015911, (*i.e.*, TIG's notices to its retrocessionaires), TIG is invoking privilege on a document that was not authored by an attorney, that was distributed to third parties, and that involves a claims function not a legal one. You indicated that TIG considers this document as privileged because TIG has a common interest with its retrocessionaires and because the document reflects advice of counsel, although it is not authored by an attorney. This rationale is not credible. Please advise whether AIU must move to compel production of these materials.

5. Electronic Review. I asked you if TIG has performed searches for electronic documents. You indicated that TIG had performed a search of all company electronic files which did not discriminate as to particular and individual persons employed at TIG. Rather, the entire e-mail database of TIG was searched for responsive materials. You also indicated that this electronic search was not date delimited. I also asked you to confirm whether you had searched the desk files for all persons referenced in your interrogatory responses. You indicated that you believed so, but that you would confirm this fact with me. Please note that given TIG's view that it may designate the names of persons at AIU whose files should be electronically searched, AIU reserves its right to inquire whether you have reviewed documents of TIG representatives who do not appear in your Interrogatory Responses. Once we receive a response from you on this point, we will reserve our right to provide a supplemental list of persons whose files should be reviewed.

6. "Other" Claims Files. I asked for confirmation that TIG itself has not produced its "other claims" files (*i.e.*, claims relating to the 48 Insulations and boiler claims) even as it seeks the production of such files from AIU. You agreed that TIG has not produced these materials.

7. Withheld Commutation Documents. Having raised the defense that AIU's purported late notice prejudiced TIG's commutations, TIG has indicated that it has withheld two categories of commutation documents: (i) internal management reports relating to the commutations; and (ii) commutation documents created after the commutations, including summary and payment documents. I explained AIU's position that these documents are relevant to TIG's defense: For instance, the management reports might indicate TIG's views on the likelihood of recovering funds from the commuting parties absent such commutations. These

documents may also shed light on TIG's assertion that it could have extracted greater consideration from the commuting reinsurers as a result of the Foster Wheeler losses referenced in the Complaint. Similarly, I explained that just because communications at issue took place after the commutation does not detract from the relevance of such documents. Having put the commutation defense at issue, TIG may not selectively pick which documents from the commutation AIU gets to see. You indicated that you would consider these arguments and get back to me. Please advise whether TIG will produce such materials and if so when it expects to be in a position to produce them.

8. Other Commutation Documents.

a. I expressed my concern that TIG has produced limited internal documents relating to the commutations raised by TIG. I also asked whether TIG, as a matter of course, prepared any internal analysis, narratives, memoranda and/or recommendations considering the potential advantages, disadvantages or appropriateness of entering into the applicable commutations. You indicated that such materials may fall into the "internal management" documents that are presently being withheld by TIG, but that TIG has not withheld other internal correspondence relating to the commutations.

b. I also inquired whether TIG has produced both its assumed and ceded materials relating to the commutations. You indicated that TIG has produced such materials.

9. Generic Objections. Although I did not raise this point in our phone conference, I am writing to seek the same confirmation that you sought in your discovery correspondence: i.e., that to the extent TIG is withholding potentially responsive documents on the basis of "generic" objections (or, for that matter, on the basis of any of its objections) that TIG affirmatively disclose the existence of such materials. My understanding is that the only categories of documents falling into this category are the two types of commutation documents identified above in point 7. Please let me know if my understanding is inaccurate. Indeed, if you believe that I have not accurately captured any of our discussions please let me know as soon as possible.

Finally, please note that as AIU continues to analyze TIG's production, it reserves its right to raise additional discovery concerns that may not be set forth in this correspondence. We look forward to continuing our discussion of these matters.

Very truly yours,



Marc L. Abrams

cc: Sean Thomas Keely

# **EXHIBIT K**

BUTLER RUBIN SALTARELLI & BOYD LLP

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April 10, 2008

Direct Dial: (312) 696-4478  
Direct Fax: (312) 444-9018  
jaldort@butlerrubin.com

**BY ELECTRONIC MAIL**

Marc L. Abrams  
Wollmuth Maher & Deutsch LLP  
500 Fifth Avenue  
12th Floor  
New York, New York 10110

Re: AIU Insurance Company v. TIG Insurance Company, 07 C 7052

Dear Marc:

I write in response to your letter dated April 9, 2008, which attempts to summarize our discussions from last Monday, April 7, 2008. Your letter does not accurately portray the substance and tone of our discussions. Below, in an effort to correct and clarify the record, I will address your points in the order in which you raised them. In addition, I will summarize our discussions regarding AIU's discovery responses, which you omitted from your letter.

1. AIU Audit Documents – Your summary is not accurate. In our call I confirmed that TIG had produced the entirety of the collection of documents AIU provided to TIG from the July 2007 audit. You requested that TIG provide the bates ranges for these documents. While TIG is under no obligation to do so, as a courtesy, TIG will provide such information. The AIU audit documents bear bates ranges TIG 1371 through 3424.

William Pascale and Joseph Loggia conducted the audit of AIU's files. They prepared analyses regarding the audit at the direction of counsel in anticipation of litigation. To the extent that documents relating to the audit were withheld, TIG logged such documents as privileged based on the work product doctrine or based on attorney/client communications. This should not come as a "surprise" to you given that AIU served TIG with the instant lawsuit less than a month after the audit was completed and five days after responding to TIG's audit inquiries. Clearly, AIU was anticipating litigation against TIG during or even before the audit.

As I stated during our call, I am investigating whether any of the auditors' notes can be provided in redacted form. We will make that determination in the next few days and, if appropriate, make a supplemental production.

2. Claims Documents – Again, your summary of our discussion is not accurate. I take issue with your statement that "TIG has produced virtually no internal documents of substance related to the assumed claim." As I stated in our call, AIU did not provide notice to TIG until January 2007. Specifically, TIG received the first notice of the claims on January 31,



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2007. AIU initiated litigation against TIG just over six months after providing the initial notice so there was not much opportunity for the file to accumulate significant volume. Thus, your “surprise” at the limited volume of assumed file documents seems disingenuous.

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As you can easily glean from TIG’s privilege log, TIG began consulting with its in-house reinsurance counsel one day after receiving the problematic notice and retained outside reinsurance counsel shortly thereafter. Again, AIU plainly was also anticipating litigation at that time given that it sued TIG within months of the notice, and its privilege log is rife with listings regarding consultations with respect to “reinsurance collection” during this period. Your “skepticism” of TIG’s work product claim is, therefore, misplaced.

You failed to note in your letter that I responded to your argument that TIG’s work product claims were somehow flawed because no attorneys were listed as authors or recipients. In our call, I explained that the protected documents relate to work performed at the direction of counsel or discussions of attorney advice or requests for such advice. We expressly stated this in our privilege log and redaction entries. Indeed, AIU’s privilege and redaction logs contain numerous entries in which work product and/or attorney client privilege are claimed but no attorney is listed as an author or recipient. *See, e.g.,* entries 125, 126, 195, 231, 275, 527, 530, 531, and redactions PL 53889, PL 53890, PL 53898, PL 59268, PL 59278, PL 59459-60, PL 59463-64, PL 59465-66.

3. Reserving Documents – To clarify your statements with respect to the “Reserving Documents,” during our call, I confirmed that TIG had produced all responsive, non-objectionable documents pursuant to its responses to AIU Document Requests Nos. 7 and 9.

4. Redactions – Your summary of our discussions is incomplete. During our call you raised a few questions relating to TIG’s redaction log. First, as to your subparagraph (a), TIG disagrees with your contention that the “to/from/cc/re” lines in privileged emails should not be redacted. TIG has complied with its obligation to identify authors and recipients by providing the applicable information in its redaction log. The lack of merit in AIU’s position can be easily demonstrated by AIU’s own redactions. For example, the following AIU documents contain complete redactions, including the information that you contend should not have been redacted by TIG: PL 53917-53918, PL 53906, PL 53907, PL 53902-53904, PL 53899-53901. *If you, nonetheless, still believe that TIG’s redactions are incorrect, please provide the legal basis and please provide revised redactions for all of the AIU documents containing such redactions.*

Second, as to your subparagraph (b), in our discussion I requested that AIU provide a list of the documents that it believed were redacted, but not included on TIG’s redaction log. (However, you omitted this from your summary in your letter.) I note that, instead, you have identified two sample documents in response to my request. I researched these and found that they are both privileged redactions that post-date the Complaint, and this can be easily gleaned

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from the unredacted portions of the documents which are earlier emails dated well after August 7, 2007. Recall that the parties agreed not to log such privilege claims. Thus, TIG's redaction log is proper. Of course, to the extent that TIG discovers any redactions (other than those post-dating the Complaint) that are not logged, TIG will supplement its redaction log. *Along the same lines, TIG has discovered large volumes of redactions by AIU that are not included on its redaction log, which should report all redactions (regardless of basis) pre-dating the Complaint. See, e.g., PL 58891, PL 58949-59258, PL 53514, PL 53950-52, PL 53953, PL 58190-204, PL 58206, PL 58208-46, PL 58319-403, PL 58405-89, PL 58491-570, PL 58572-656, PL 58658-747, PL 58789-873, PL 58891, PL 58949-59258, PL 59347-48. Please advise when AIU will provide a redaction log for these documents and any others that were not logged.*

Third, regarding your subparagraph (c), as I stated in our call, the bases for TIG's redactions are expressly set forth in our redaction log. As examples, I pointed to the redactions for "Bank account number," which redacted TIG's confidential banking information, and to the redactions described as "Management Report," which reflect the reports relating to the commutation that I previously advised you would be withheld.

Fourth, regarding your subparagraph (d), as I stated in our call, TIG disagrees with your contention that TIG improperly redacted its notices to its retrocessionaires. I explained that the redactions reflect legal advice received by TIG and/or information protected by the work product doctrine. *See, supra*, Sections 1 and 2. Again, your arguments challenging TIG's redactions seem specious, particularly since AIU has claimed privilege as respects several documents that do not reflect attorney involvement. *See, e.g.*, entries 125, 126, 195, 231, 275, 527, 530, 531, and redactions PL 53889, PL 53890, PL 53898, PL 59268, PL 59278, PL 59459-60, PL 59463-64, PL 59465-66. Given that these redactions are plainly privileged, if you still contend that you are entitled to these documents, please state with specificity the legal basis for that contention.

5. Electronic Review – Your letter reflects a misunderstanding of my explanation regarding TIG's electronic searches providing during the call. As I explained in response to your inquiries during the call, TIG has conducted extensive electronic searches, including complete searches of its electronic claims files and the electronic mailboxes (to the extent any exist) of all the relevant individuals. I also explained that these searches were performed using search software on the email databases, rather than by having an individual provide what he or she believed were relevant emails from his or her email boxes. Per your request, I can confirm that TIG has searched the electronic mailboxes for those individuals listed in its interrogatory responses. The only exception is Norm Reid, who was not a TIG employee at the time of the placement and who did not have an electronic mailbox as the relevant period pre-dated the existence of email. Be assured that, to the extent TIG possessed any of Mr. Reid's files and they were responsive and not privileged, we produced them. TIG also confirms that it obtained desk files to the extent that they existed. *Given the level of detail AIU has sought from TIG, TIG fully expects AIU's compliance with TIG's request that it perform appropriate electronic (and desk file) searches for those individuals identified in my letters dated April 1, 2008 and April 3, 2008. TIG also expects AIU to include in its response to my letter an explanation of the steps taken to conduct its electronic searches of individual email boxes and its electronic databases, as you*

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*have requested from TIG and as TIG has provided. If you refuse to provide any of this information, please so advise me so that TIG may seek appropriate relief from the Court.*

6. Other Claims Files – You are correct that I advised that TIG has not produced its Other Claims files. As you know, I previously advised you during our other meet and confers that, to the extent they exist, TIG stands ready to produce its assumed files for these claims upon AIU's agreement to comply with TIG's document requests seeking documents relating to the Other Claims or upon the Court's order compelling AIU to produce such documents. As I also advised, TIG will indicate this in its forthcoming motion to compel.

7. Commutation Documents Withheld Based on Objection – Your summary of our discussion is inaccurate. In our call, you stated that AIU seeks the management reports and post-commutation documents because you believe that these documents might contain information relating to whether TIG was likely to recover from the commuting retrocessionaires. TIG is still reviewing this issue and will respond next week.

8. Other Commutation Documents – As I stated in our call, TIG confirms that it has produced all documents responsive to AIU Document Requests 13 through 17, subject to TIG's stated objections. The only exceptions are those documents falling into the categories noted above in Section 7.

9. General Objections – TIG confirms that it is not withholding any documents based on the "generic" objections other than the commutation documents discussed above in Section 7. You have now advised that AIU is withholding two categories of documents based on these "generic objections": joint defense documents and billing documents for AIU's coverage counsel. I will follow up with you on these two categories of withheld documents. *Please confirm that AIU is not withholding any other documents based on the "generic objections."*

\* \* \*

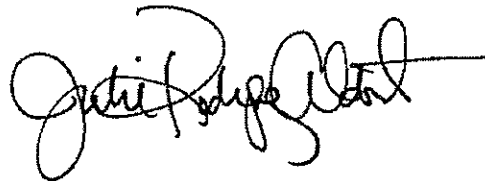
Your letter did not address our discussions regarding AIU's discovery responses and its production, which I will briefly address here. I understood from our April 7, 2008 meet and confer that shortly after our call you would be providing a written response to my letter dated April 3, 2008. This morning, you informed me that your response would be provided by the end of this week. I await that response. Similarly, during our call you also advised that, contrary to your projection during last week's meet and confer, AIU would not be able to complete its supplemental production by early this week. You declined to provide any information as to which documents would be provided and on what time schedule, stating only that AIU was endeavoring to comply as quickly as possible. We have yet to receive any of the promised supplemental documents.

During our call, we briefly discussed AIU's Interrogatory Response No. 17, which I had raised as an issue in my letter dated April 3, 2008. You stated that AIU would likely supplement its response with reference to documents.

Marc L. Abrams  
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I look forward to receiving your response to my April 3, 2008 letter. I have attempted to address AIU's concerns as respects Sections 1 through 9 above, with the exception of Section 7, which we will address next week. If a dispute still exists regarding Sections 1 through 6 or 8 and 9, please advise me so that we can have a further meet and confer.

Sincerely,

A handwritten signature in black ink, appearing to read "Julie Rodriguez Aldort". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Julie Rodriguez Aldort

cc: Sean Keely  
William Maher  
James I. Rubin  
Catherine E. Isely

W0066078v1

# **EXHIBIT L**

**WOLLMUTH MAHER & DEUTSCH LLP**

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TELEPHONE (212) 382-3300  
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April 17, 2008

**BY E-MAIL AND  
FIRST CLASS MAIL**

Julie Rodriguez Aldort, Esq.  
Butler Rubin Saltarelli & Boyd LLP  
70 West Madison, Suite 1800  
Chicago, Illinois 60602

Re: AIU Insurance Company v. TIG Insurance Company,  
Case No. 07-cv-7052 (SHS)

Dear Julie:

I write in response to your letter dated April 10, 2008 (the "April 10, 2008 Letter") purporting to respond to my letter of April 9, 2008. It does not serve the process to accuse me of being "disingenuous," holding "misplaced" and "inaccurate" views, making "specious" arguments, demanding that I account for my own discovery positions and then ending your letter with the statement "if a dispute still exists regarding sections 1 through 6 or 8 and 9 [i.e., almost my entire letter], please advise me so that we can have a further meet and confer."

AIU has little interest in exchanging interminable rounds of discovery letters replete with the posturing that unfortunately has found its way into your correspondence. See e.g., April 10, 2008 Letter at 1 ("Clearly AIU was anticipating litigation against TIG during or even before the audit."); at 2

**REDACTED**

Rather, the point of the process is to determine whether the parties have reached a discovery impasse, allowing them to subsequently consider whether they will move the Court to compel the production of the disputed materials.

Based on your letter it is clear that TIG is refusing production of certain of its claims and audit documents in its assumed claims file based on the assertion that these documents are subject to work product doctrine protection. TIG is also taking the position that it may redact parts of its notices to its retrocessionaires based on the work product doctrine. AIU disagrees with these designations and accordingly intends to petition the Court for their production.

Finally, please note that AIU rejects your correspondence in its entirety, particularly the self-serving "factual" statements regarding AIU's purported conduct. Nonetheless, we do thank you for your candidness in explaining the role that TIG's in-house and outside counsel played in the inspection and claims handling process.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Marc L. Abrams', with a stylized, cursive flourish.

Marc L. Abrams

cc: Sean Thomas Keely

# **EXHIBIT M**

3/25/2008

**TIG Insurance Company's Privilege Log**  
in the matter of AUI Insurance Company v. TIG Insurance Company

No.	Date	Author	Recipients	Document Type	Subject	Legal Basis for Withholding
001	11/5/2002	Goepfert-Kurt	Parker-John; Falk-Steve; DeMaria-Frank	Email and Attachment	Communication re legal analysis of KWELM commutation	Attorney-client privilege
002	11/6/2002	Parker-John	Goepfert-Kurt; DeMaria-Frank; Falk-Steve	Email and Attachment	Communication re legal analysis of KWELM commutation	Attorney-client privilege
003	11/7/2002	Goepfert-Kurt	Falk-Steve; Parker-John; DeMaria-Frank	Email and Attachment	Communication re legal analysis of KWELM commutation	Attorney-client privilege
004	12-2002	Gilland-Donna	Counsel	Draft Spreadsheet with handwritten notes	Calculation re Bryanson commutation of counsel	Attorney work product doctrine
005	12-2002	DeMaria-Frank	Parker-John	Draft settlement agreement with Handwritten Notes	Communication re legal analysis and assessment of KWELM commutation agreement at direction of counsel	Attorney-client privilege
006	12-2002	Parker-John	DeMaria-Frank	Draft settlement agreement with Handwritten Notes	Communication re legal analysis and assessment of KWELM commutation agreement	Attorney-client privilege
007	12-2002	Parker-John	DeMaria-Frank	Draft settlement agreement with Handwritten Notes	Communication re legal analysis and assessment of KWELM commutation agreement	Attorney-client privilege
008	12-2002	Parker-John	DeMaria-Frank	Draft settlement agreement with Handwritten Notes	Communication re legal analysis and assessment of KWELM commutation agreement	Attorney-client privilege
009	12-2002	DeMaria-Frank	Parker-John	Agreement with Handwritten Notes	Communication re legal analysis and assessment of KWELM commutation agreement at direction of counsel	Attorney-client privilege
010	12-2002	Parker-John	DeMaria-Frank	Draft settlement agreement with Handwritten Notes	Communication re legal analysis and assessment of KWELM commutation agreement	Attorney-client privilege
011	12-2002	Parker-John	DeMaria-Frank	Draft settlement agreement with Handwritten Notes	Communication re legal analysis and assessment of KWELM commutation agreement	Attorney-client privilege
012	12-2002	DeMaria-Frank	Parker-John	Draft settlement agreement with Handwritten Notes	Communication re legal analysis and assessment of KWELM commutation agreement at direction of counsel	Attorney-client privilege
013	12-2002	DeMaria-Frank	Parker-John	Draft settlement agreement with Handwritten Notes	Communication re legal analysis and assessment of KWELM commutation agreement at direction of counsel	Attorney-client privilege
014	12/1/2002	DeMaria-Frank	Counsel	Draft Spreadsheet	Communication re legal analysis of KWELM commutation	Attorney-client privilege
015	12/1/2002	DeMaria-Frank	Counsel	Draft Spreadsheet with Handwritten Notes	Communication re legal analysis of KWELM commutation	Attorney-client privilege
016	12/1/2002	DeMaria-Frank	Counsel	Draft Spreadsheet with handwritten notes	Communication re legal analysis of KWELM commutation at direction of counsel	Attorney-client privilege
017	12/27/2002	Gilland-Donna	DeMaria-Frank	Email and Attachment	Communication re legal analysis of KWELM commutation at direction of counsel	Attorney-client privilege
018	12/30/2002	DeMaria-Frank	Parker-John	Email and Attachment	Communication re legal analysis of KWELM commutation	Attorney-client privilege
019	12/30/2002	Beaudoin-Nancy	DeMaria-Frank; Parker-John	Email and Attachment	Communication requesting legal analysis of KWELM commutation agreement	Attorney-client privilege
020	1/3/2003	Parker-John	DeMaria-Frank	Email and Attachment	Communication re legal analysis re KWELM commutation agreement	Attorney-client privilege
021	1/6/2003	Parker-John	DeMaria-Frank	Email and Attachment	Providing legal advice re KWELM commutation agreement	Attorney-client privilege
022	1/13/2003	Parker-John	DeMaria-Frank	Email and Attachment	Providing legal advice re KWELM commutation agreement	Attorney-client privilege
023	1/13/2003	DeMaria-Frank	Parker-John	Email and Attachment	Communication re legal analysis of KWELM commutation agreement	Attorney-client privilege
024	1/14/2003	DeMaria-Frank	Parker-John	Email and Attachment	Communication re legal analysis of KWELM commutation agreement	Attorney-client privilege
025	1/14/2003	Parker-John	DeMaria-Frank	Email	Providing legal advice re KWELM commutation agreement	Attorney-client privilege
026	1/17/2003	DeMaria-Frank	Parker-John	Email and Attachment	Requesting legal advice re KWELM commutation agreement	Attorney-client privilege
027	1/24/2003	DeMaria-Frank	Parker-John	Email and Attachment	Requesting legal advice re KWELM commutation agreement	Attorney-client privilege
028	1/27/2003	DeMaria-Frank	Parker-John	Email	Requesting legal advice re KWELM commutation agreement	Attorney-client privilege

## TIG Insurance Company's Privilege Log

in the matter of AUI Insurance Company v. TIG Insurance Company

3/25/2008

001	11/5/2002	Goesfert-Kurt	Parker-John; Falk-Sleve; DeMaria-Frank	Email and Attachment	Communication re legal analysis of KWELM commutation	Attorney-client privilege
029	2/25/2003	Parker-John	DeMaria-Frank	Email	Communication re legal analysis of KWELM commutation	Attorney-client privilege
030	3/3/2003	DeMaria-Frank	Parker-John	Email	Communication re legal analysis of KWELM commutation	Attorney-client privilege
031	2/12/2004	DeMaria-Frank	Parker-John; Becker-Jones-Clive	Email and Attachment	Request for legal advice re BFMIC commutation	Attorney-client privilege
032	3/8/2004	DeMaria-Frank	Beaudoin-Nancy	Email and Attachment	Communication re request for legal advice re BFMIC commutation	Attorney-client privilege
033	8/15/2005	Gilland-Donna	Counsel	Draft Spreadsheets	Calculation re Bryanston commutation at direction of counsel	Attorney-client privilege
034	02-2007	Gilland-Donna		Handwritten notes	Communication re legal analysis and assessment at direction of counsel re CER commutation	Attorney work product doctrine
035	2/1/2007	Staley-Michael	Parker-John	Memorandum	Communication re investigation/inquiry at direction of counsel re AUI's Foster Wheeler claims	Attorney-client privilege; Attorney work product doctrine
036	2/6/2007	Parker-John	Gossett-Bob; Pascale-Bill; Lemire-Maureen; Staley-Michael	Email	Communication re legal analysis of AUI's Foster Wheeler claims	Attorney-client privilege; Attorney work product doctrine
037	2/6/2007	Gossett-Bob	Staley-Michael; Parker-John; Pascale-Bill; Lemire-Maureen	Email	Communication re legal analysis of AUI's Foster Wheeler claims	Attorney-client privilege; Attorney work product doctrine
038	2/6/2007	Stelmach-Doreen	Staley-Michael	Email	Communication re investigation/inquiry at direction of counsel re AUI's Foster Wheeler claims	Attorney work product doctrine
039	2/6/2007	Staley-Michael	Gossett-Bob; Pascale-Bill; Parker-John; Lemire-Maureen	Email	Communication re investigation/inquiry at direction of counsel re AUI's Foster Wheeler claims	Attorney-client privilege; Attorney work product doctrine
040	2/6/2007	Gossett-Bob	Staley-Michael	Email	Communication re investigation/inquiry at direction of counsel re AUI's Foster Wheeler claims	Attorney-client privilege; Attorney work product doctrine
041	2/7/2007	Staley-Michael		Memorandum	Communication re investigation/inquiry at direction of counsel re AUI's Foster Wheeler claims	Attorney work product doctrine
042	2/7/2007	Staley-Michael	Parker-John	Progress Note with handwritten notes	Communication re investigation/inquiry at direction of counsel re AUI's Foster Wheeler claims	Attorney-client privilege; Attorney work product doctrine
043	2/7/2007	Staley-Michael	Parker-John	Progress Note	Communication re investigation/inquiry at direction of counsel re AUI's Foster Wheeler claims	Attorney-client privilege; Attorney work product doctrine
044	2/7/2007	Staley-Michael	Parker-John	Progress Note	Communication re investigation/inquiry at direction of counsel re AUI's Foster Wheeler claims	Attorney-client privilege; Attorney work product doctrine
045	2/7/2007	Staley-Michael	Parker-John	Progress Note	Communication re investigation/inquiry at direction of counsel re AUI's Foster Wheeler claims	Attorney-client privilege; Attorney work product doctrine
046	2/7/2007	Staley-Michael	Parker-John	Progress Note	Communication re investigation/inquiry at direction of counsel re AUI's Foster Wheeler claims	Attorney-client privilege; Attorney work product doctrine
047	2/7/2007	Staley-Michael	Parker-John	Progress Note	Communication re investigation/inquiry at direction of counsel re AUI's Foster Wheeler claims	Attorney-client privilege; Attorney work product doctrine
048	2/7/2007	Staley-Michael	Parker-John	Progress Note	Communication re investigation/inquiry at direction of counsel re AUI's Foster Wheeler claims	Attorney-client privilege; Attorney work product doctrine
049	2/7/2007	Staley-Michael	Parker-John	Progress Note	Communication re investigation/inquiry at direction of counsel re AUI's Foster Wheeler claims	Attorney-client privilege; Attorney work product doctrine
050	2/7/2007	Staley-Michael	Parker-John	Progress Note	Communication re investigation/inquiry at direction of counsel re AUI's Foster Wheeler claims	Attorney-client privilege; Attorney work product doctrine
051	2/7/2007	Staley-Michael	Parker-John	Progress Note	Communication re investigation/inquiry at direction of counsel re AUI's Foster Wheeler claims	Attorney-client privilege; Attorney work product doctrine
052	2/7/2007	Staley-Michael	Parker-John	Progress Note	Communication re investigation/inquiry at direction of counsel re AUI's Foster Wheeler claims	Attorney-client privilege; Attorney work product doctrine
053	2/7/2007	Staley-Michael	Parker-John	Progress Note	Communication re investigation/inquiry at direction of counsel re AUI's Foster Wheeler claims	Attorney-client privilege; Attorney work product doctrine
054	2/7/2007	Staley-Michael	Parker-John	Progress Note	Communication re investigation/inquiry at direction of counsel re AUI's Foster Wheeler claims	Attorney-client privilege; Attorney work product doctrine
055	2/7/2007	Staley-Michael	Parker-John	Progress Note	Communication re investigation/inquiry at direction of counsel re AUI's Foster Wheeler claims	Attorney-client privilege; Attorney work product doctrine
056	2/7/2007	Staley-Michael	Parker-John	Progress Note	Communication re investigation/inquiry at direction of counsel re AUI's Foster Wheeler claims	Attorney-client privilege; Attorney work product doctrine
057	2/7/2007	Staley-Michael	Parker-John	Progress Note	Communication re investigation/inquiry at direction of counsel re AUI's Foster Wheeler claims	Attorney-client privilege; Attorney work product doctrine

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001	11/5/2002	Goepfert-Kurt	Parker-John; Falk-Steve; DeMaria-Frank	Email and Attachment	Communication re legal analysis of KWELM commutation	Attorney-client privilege
058	2/7/2007	Staley-Michael	Parker-John	Progress Note	Communication re investigation/inquiry at direction of counsel re AIU's Foster Wheeler claims	Attorney-client privilege; Attorney work product doctrine
059	2/7/2007	Staley-Michael	Parker-John	Progress Note	Communication re investigation/inquiry at direction of counsel re AIU's Foster Wheeler claims	Attorney-client privilege; Attorney work product doctrine
060	2/7/2007	Staley-Michael	Parker-John	Progress Note	Communication re investigation/inquiry at direction of counsel re AIU's Foster Wheeler claims	Attorney-client privilege; Attorney work product doctrine
061	2/7/2007	Staley-Michael	Parker-John	Progress Note	Communication re investigation/inquiry at direction of counsel re AIU's Foster Wheeler claims	Attorney-client privilege; Attorney work product doctrine
062	2/7/2007	Staley-Michael	Parker-John	Progress Note	Communication re investigation/inquiry at direction of counsel re AIU's Foster Wheeler claims	Attorney-client privilege; Attorney work product doctrine
063	2/7/2007	Staley-Michael	Parker-John	Progress Note	Communication re investigation/inquiry at direction of counsel re AIU's Foster Wheeler claims	Attorney-client privilege; Attorney work product doctrine
064	2/7/2007	Staley-Michael	Parker-John	Progress Note	Communication re investigation/inquiry at direction of counsel re AIU's Foster Wheeler claims	Attorney-client privilege; Attorney work product doctrine
065	2/7/2007	Staley-Michael	Parker-John	Progress Note	Communication re investigation/inquiry at direction of counsel re AIU's Foster Wheeler claims	Attorney-client privilege; Attorney work product doctrine
066	2/7/2007	Staley-Michael	Parker-John	Progress Note	Communication re investigation/inquiry at direction of counsel re AIU's Foster Wheeler claims	Attorney-client privilege; Attorney work product doctrine
067	2/7/2007	Staley-Michael	Parker-John	Progress Note	Communication re investigation/inquiry at direction of counsel re AIU's Foster Wheeler claims	Attorney-client privilege; Attorney work product doctrine
068	2/7/2007	Staley-Michael	Parker-John	Progress Note	Communication re investigation/inquiry at direction of counsel re AIU's Foster Wheeler claims	Attorney-client privilege; Attorney work product doctrine
069	2/7/2007	Staley-Michael	Parker-John	Progress Note	Communication re investigation/inquiry at direction of counsel re AIU's Foster Wheeler claims	Attorney-client privilege; Attorney work product doctrine
070	2/7/2007	Staley-Michael	Parker-John	Progress Note	Communication re investigation/inquiry at direction of counsel re AIU's Foster Wheeler claims	Attorney-client privilege; Attorney work product doctrine
071	2/7/2007	Staley-Michael	Parker-John	Progress Note	Communication re investigation/inquiry at direction of counsel re AIU's Foster Wheeler claims	Attorney-client privilege; Attorney work product doctrine
072	2/7/2007	Staley-Michael	Parker-John	Progress Note	Communication re investigation/inquiry at direction of counsel re AIU's Foster Wheeler claims	Attorney-client privilege; Attorney work product doctrine
073	2/7/2007	Staley-Michael	Parker-John	Progress Note	Communication re investigation/inquiry at direction of counsel re AIU's Foster Wheeler claims	Attorney-client privilege; Attorney work product doctrine
074	2/7/2007	Staley-Michael	Parker-John	Progress Note	Communication re investigation/inquiry at direction of counsel re AIU's Foster Wheeler claims	Attorney-client privilege; Attorney work product doctrine
075	2/7/2007	Staley-Michael	Parker-John	Progress Note	Communication re investigation/inquiry at direction of counsel re AIU's Foster Wheeler claims	Attorney-client privilege; Attorney work product doctrine
076	2/7/2007	Staley-Michael	Parker-John	Progress Note	Communication re investigation/inquiry at direction of counsel re AIU's Foster Wheeler claims	Attorney-client privilege; Attorney work product doctrine
077	2/12/2007	Pascale-Bill	LeBlanc-Sandra	Email	Communication re investigation/inquiry at direction of counsel re AIU's Foster Wheeler claims	Attorney work product doctrine
078	2/12/2007	LeBlanc-Sandra	Pascale-Bill	Email	Communication re investigation/inquiry at direction of counsel re AIU's Foster Wheeler claims	Attorney work product doctrine
079	2/12/2007	McCarthy-Linda	ARO/TRG@TRG; Staley-Michael	Email	Communication re investigation/inquiry at direction of counsel re AIU's Foster Wheeler claims	Attorney work product doctrine
080	2/12/2007	Gilliland-Donna	LeGros-Christopher; Westover-Michael	Email	Communication re investigation/inquiry at direction of counsel re AIU's Foster Wheeler claims	Attorney work product doctrine
081	2/13/2007	McCarthy-Linda	Staley-Michael	Email	Communication re investigation/inquiry at direction of counsel re AIU's Foster Wheeler claims	Attorney work product doctrine
082	2/13/2007	Staley-Michael	McCarthy-Linda	Email	Communication re investigation/inquiry at direction of counsel re AIU's Foster Wheeler claims	Attorney work product doctrine
083	2/13/2007	McCarthy-Linda	Staley-Michael	Email	Communication re investigation/inquiry at direction of counsel re AIU's Foster Wheeler claims	Attorney work product doctrine
084	2/15/2007	Isely-Catherine	Parker-John	Email and Attachment	Communication re legal representation	Attorney-client privilege
085	2/20/2007	Parker-John	LeGros-Christopher	Email and Attachment	Communication re investigation/inquiry and legal analysis at direction of counsel re AIU's Foster Wheeler claims	Attorney-client privilege
086	2/21/2007	Pascale-Bill		Notes		Attorney work product doctrine

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001	11/5/2002	Goepfert-Kurt	Parker-John; Falk-Steve; DeMaria-Frank	Email and Attachment	Communication re legal analysis of KWELM commutation	Attorney-client privilege
087	2/26/2007	Gilliland-Donna	LeGros-Christopher; Westover-Michael	Email and Attachment	Communication re investigation/inquiry at direction of counsel re AUI's Foster Wheeler claims	Attorney work product doctrine
088	2/26/2007	Gilliland-Donna	LeGros-Christopher; Westover-Michael	Email and Attachment	Communication re investigation/inquiry at direction of counsel re AUI's Foster Wheeler claims	Attorney work product doctrine
089	2/26/2007	Gilliland-Donna	LeGros-Christopher; Westover-Michael	Spreadsheet	Communication re investigation/inquiry at direction of counsel re AUI's Foster Wheeler claims	Attorney work product doctrine
090	2/27/2007	LeGros-Christopher	Parker-John; Isely-Catherine	Email and Attachment	Communication re commutation analysis undertaken at the direction of counsel	Attorney-client privilege; Attorney work product doctrine
091	2/28/2007	Westover-Michael	Parker-John; Pascale-Bill	Email and Attachment	Communication re legal analysis and assessment of commutations	Attorney-client privilege; work product doctrine
092	3/1/2007	Pascale-Bill	Staley-Michael	Email and Attachment	Communication re legal analysis and assessment of commutations	Attorney work product doctrine
093	3/12/2007	Gilliland-Donna	Westover-Michael; LeGros-Christopher	Email and Attachment	Communication re legal analysis and assessment of AUI's Foster Wheeler claims and Byranson and CER commutations	Attorney work product doctrine
094	3/12/2007	Pascale-Bill	Alvino-Ginamarie	Email and Attachment	Communication re investigation/inquiry at direction of counsel re AUI's Foster Wheeler claims	Attorney-client privilege
095	3/12/2007	Staley-Michael		Handwritten notes	Communication re investigation/inquiry at direction of counsel re AUI's Foster Wheeler claims	Attorney-client privilege; Attorney work product doctrine
096	3/13/2007	LeGros-Christopher	Westover-Michael	Email and Attachment	Communication re investigation/inquiry at direction of counsel re AUI's Foster Wheeler claims	Attorney work product doctrine
097	04-2007	Staley-Michael		Handwritten notes	Communication re investigation/inquiry at direction of counsel of AUI's Foster Wheeler claims	Attorney work product doctrine
098	04-2007	Staley-Michael		Handwritten notes	Communication re legal analysis and assessment of AUI's Foster Wheeler claims	Attorney work product doctrine
099	4/2/2007	Pascale-Bill	Parker-John; Staley-Michael	Email	Communication re investigation/inquiry at direction of counsel re AUI's Foster Wheeler claims	Attorney-client privilege
100	4/2/2007	Parker-John	Staley-Michael; Pascale-Bill	Email	Communication re investigation/inquiry at direction of counsel re AUI's Foster Wheeler claims	Attorney-client privilege
101	4/2/2007	Staley-Michael	Parker-John; Pascale-Bill	Email	Communication re investigation/inquiry at direction of counsel re AUI's Foster Wheeler claims	Attorney-client privilege
102	4/2/2007	Staley-Michael	Parker-John; Pascale-Bill	Email with Handwritten Notes	Communication re investigation/inquiry at direction of counsel re AUI's Foster Wheeler claims	Attorney-client privilege
103	4/3/2007	Gilliland-Donna	Counsel	Draft Spreadsheet	Communication re legal analysis of AUI's Foster Wheeler claims	Attorney work product doctrine
104	4/3/2007	Staley-Michael	Parker-John	Email and Attachment	Request for legal advice re draft communication	Attorney-client privilege; Attorney work product doctrine
105	4/9/07	Staley-Michael	Counsel	Draft Spreadsheet	Communication re investigation/inquiry at direction of counsel re AUI's Foster Wheeler claims	Attorney work product doctrine
106	4/9/07	Staley-Michael	Counsel	Draft Spreadsheet	Communication re investigation/inquiry at direction of counsel re AUI's Foster Wheeler claims	Attorney work product doctrine
107	4/9/2007	Staley-Michael	Hanna-Michael	Email	Communication re investigation/inquiry at direction of counsel re AUI's Foster Wheeler claims	Attorney work product doctrine
108	4/10/2007	Staley-Michael	Baldwin-Sara	Email	Communication re investigation/inquiry at direction of counsel re AUI's Foster Wheeler claims	Attorney work product doctrine
109	4/10/2007	Staley-Michael	Pascale-Bill	Email and Attachment	Communication re investigation/inquiry at direction of counsel re AUI's Foster Wheeler claims	Attorney work product doctrine
110	4/10/2007	Hanna-Michael	Staley-Michael	Email and Attachment	Communication re investigation/inquiry at direction of counsel re AUI's Foster Wheeler claims	Attorney work product doctrine
111	4/10/2007	Hanna-Michael	Staley-Michael	Email with Handwritten Notes	Communication re investigation/inquiry at direction of counsel re AUI's Foster Wheeler claims	Attorney work product doctrine
112	4/12/2007	Pascale-Bill	Parker-John; Staley-Michael	Email	Communication re investigation/inquiry at direction of counsel re AUI's Foster Wheeler claims	Attorney-client privilege; Attorney work product doctrine

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001	11/5/2002	Goepfert-Kurt	Parker-John; Falk-Steve; DeMaria-Frank	Email and Attachment	Communication re legal analysis of KWELM commutation	Attorney-client privilege
113	4/12/2007	Parker-John	Staley-Michael; Pascale-Bill	Email	Communication re investigation/inquiry at direction of counsel re AUI's Foster Wheeler claims	Attorney-client privilege; Attorney work product doctrine
114	4/12/2007	Staley-Michael	Parker-John	Email	Communication re investigation/inquiry at direction of counsel re AUI's Foster Wheeler claims	Attorney-client privilege; Attorney work product doctrine
115	4/12/2007	Staley-Michael; Parker-John	Parker-John	Claim Assistant Activity	Communication re investigation/inquiry at direction of counsel re AUI's Foster Wheeler claims	Attorney-client privilege; Attorney work product doctrine
116	4/12/2007	Staley-Michael; Parker-John	Parker-John	Claim Assistant Activity	Communication re investigation/inquiry at direction of counsel re AUI's Foster Wheeler claims	Attorney-client privilege; Attorney work product doctrine
117	4/12/2007	Staley-Michael	Parker-John	Progress Note	Communication re investigation/inquiry at direction of counsel re AUI's Foster Wheeler claims	Attorney-client privilege; Attorney work product doctrine
118	4/12/2007	Parker-John	Staley-Michael	Email	Communication re investigation/inquiry at direction of counsel re AUI's Foster Wheeler claims	Attorney-client privilege; Attorney work product doctrine
119	4/12/2007	Staley-Michael; Parker-John		Claim Assistant Activity	Communication re investigation/inquiry at direction of counsel re AUI's Foster Wheeler claims	Attorney-client privilege; Attorney work product doctrine
120	4/12/2007	Staley-Michael; Parker-John		Claim Assistant Activity	Communication re investigation/inquiry at direction of counsel re AUI's Foster Wheeler claims	Attorney-client privilege; Attorney work product doctrine
121	4/12/2007	Staley-Michael	Parker-John	Progress Note	Communication re investigation/inquiry at direction of counsel re AUI's Foster Wheeler claims	Attorney-client privilege; Attorney work product doctrine
122	4/12/2007	Staley-Michael	Parker-John	Progress Note	Communication re investigation/inquiry at direction of counsel re AUI's Foster Wheeler claims	Attorney-client privilege; Attorney work product doctrine
123	4/12/2007	Staley-Michael	Parker-John	Progress Note	Communication re investigation/inquiry at direction of counsel re AUI's Foster Wheeler claims	Attorney-client privilege; Attorney work product doctrine
124	4/12/2007	Staley-Michael	Parker-John	Progress Note	Communication re investigation/inquiry at direction of counsel re AUI's Foster Wheeler claims	Attorney-client privilege; Attorney work product doctrine
125	4/12/2007	Staley-Michael	Parker-John	Progress Note	Communication re investigation/inquiry at direction of counsel re AUI's Foster Wheeler claims	Attorney-client privilege; Attorney work product doctrine
126	4/12/2007	Staley-Michael	Parker-John	Progress Note	Communication re investigation/inquiry at direction of counsel re AUI's Foster Wheeler claims	Attorney-client privilege; Attorney work product doctrine
127	4/13/2007	Baldwin-Sara	Shiffer-Kristina	Email	Communication re investigation/inquiry of AUI's Foster Wheeler claims at the direction of counsel	Attorney work product doctrine
128	4/17/2007	Pascale-Bill	Parker-John; Staley-Michael	Email	Communication re investigation/inquiry of AUI's Foster Wheeler claims at the direction of counsel	Attorney-client privilege; Attorney work product doctrine
129	4/17/2007	Pascale-Bill	Parker-John; Staley-Michael	Email with Handwritten Notes	Communication re investigation/inquiry of AUI's Foster Wheeler claims at the direction of counsel	Attorney-client privilege; attorney work product doctrine
130	4/17/2007	Staley-Michael	Baldwin-Sara; Pascale-Bill; Shiffer-Kristina	Email and Attachment	Communication re investigation/inquiry of AUI's Foster Wheeler claims at the direction of counsel	Attorney work product doctrine
131	4/17/2007	Baldwin-Sara	Pascale-Bill; Shiffer-Kristina	Email and Attachment	Communication re investigation/inquiry of AUI's Foster Wheeler claims at the direction of counsel	Attorney work product doctrine
132	4/17/2007	Staley-Michael	Shiffer-Kristina; Baldwin-Sara; Pascale-Bill	Email and Attachment	Communication re investigation/inquiry of AUI's Foster Wheeler claims at the direction of counsel	Attorney work product doctrine
133	4/17/2007	Shiffer-Kristina	Staley-Michael; Baldwin-Sara	Email and Attachment	Communication re investigation/inquiry of AUI's Foster Wheeler claims at the direction of counsel	Attorney work product doctrine
134	4/17/2007	Staley-Michael	Pascale-Bill	Email and Attachment	Communication re investigation/inquiry at direction of counsel re AUI's Foster Wheeler claims	Attorney work product doctrine
135	4/20/2007	Shiffer-Kristina	Staley-Michael	Email	Communication re investigation/inquiry at direction of counsel re AUI's Foster Wheeler claims	Attorney work product doctrine
136	4/20/2007	Shiffer-Kristina	Staley-Michael	Email and Attachment	Communication re investigation/inquiry at direction of counsel re AUI's Foster Wheeler claims	Attorney work product doctrine
137	4/27/2007	Staley-Michael	Rubin-James; Parker-John; Pascale-Bill	Email and Attachment	Communication re AUI responses to TIG inquiries in anticipation of legal assessment	Attorney-client privilege
138	4/27/2007	Pascale-Bill	Parker-John	Email	Communication re legal analysis of AUI's Foster Wheeler claims	Attorney-client privilege

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1001	11/15/2002	Goepfert-Kurt	Parker-John; Falk-Sleve; DeMaria-Frank	Communication re legal analysis of KWELM commutation	Email and Attachment	Attorney-client privilege
139	4/27/2007	Rubin-James	Staley-Michael; Pascale-Bill; Parker-John; Isely-Catherine	Communication re legal analysis of AUI's Foster Wheeler claims	Email and Attachment	Attorney-client privilege
140	4/30/2007	Gilliland-Donna	Pascale-Bill; Westover-Michael	Communication re legal analysis and assessment of KWELM commutation	Email	Attorney work product doctrine
141	05-2007	Pascale-Bill		Communication re investigation/inquiry at direction of counsel of AUI's Foster Wheeler claims	Notes	Attorney work product doctrine
142	5/1/2007	Staley-Michael	Parker-John; Pascale-Bill	Request for legal advice re AUI's Foster Wheeler claims.	Email and Attachment	Attorney-client privilege; Attorney work product doctrine
143	5/4/2007	Staley-Michael	Stelmach-Doreen	Communication re investigation/inquiry at direction of counsel re AUI's Foster Wheeler claims	Email and Attachment	Attorney work product doctrine.
144	5/4/2007	Stelmach-Doreen	Staley-Michael	Communication re investigation/inquiry at direction of counsel re AUI's Foster Wheeler claims	Email and Attachment	Attorney work product doctrine.
145	5/4/2007	Shiffer-Kristina	Meier-Renee; Stelmach-Doreen	Communication re investigation/inquiry at direction of counsel re AUI's Foster Wheeler claims	Email	Attorney work product doctrine.
146	5/6/2007	Staley-Michael	Parker-John; Rubin-James; Pascale-Bill; Westover-Michael	Communication re investigation/inquiry at direction of counsel re AUI's Foster Wheeler claims	Memorandum with Handwritten Notes	Attorney-client privilege; Attorney work product doctrine
147	5/6/2007	Staley-Michael	Parker-John; Rubin-James; Pascale-Bill; Westover-Michael	Communication re investigation/inquiry at direction of counsel re AUI's Foster Wheeler claims	Memorandum with Handwritten Notes	Attorney-client privilege; Attorney work product doctrine
148	5/7/2007	Staley-Michael	Parker-John; Rubin-James; Pascale-Bill; Westover-Michael	Communication re AUI supplemental documentation in anticipation of matter legal assessment	Email and Attachment	Attorney-client privilege; Attorney work product doctrine
149	5/7/2007	Staley-Michael	Stelmach-Doreen	Communication re investigation/inquiry at direction of counsel re AUI's Foster Wheeler claims	Email and Attachment	Attorney work product doctrine.
150	5/7/2007	Stelmach-Doreen	Thibodeau-Elizabeth; Staley-Michael	Communication re investigation/inquiry at direction of counsel re AUI's Foster Wheeler claims	Email	Attorney work product doctrine.
151	5/7/2007	Thibodeau-Elizabeth	Stelmach-Doreen; Staley-Michael	Communication re investigation/inquiry at direction of counsel re AUI's Foster Wheeler claims	Email	Attorney work product doctrine.
152	5/7/2007	Stelmach-Doreen	Thibodeau-Elizabeth; Staley-Michael	Communication re investigation/inquiry at direction of counsel re AUI's Foster Wheeler claims	Email	Attorney work product doctrine.
153	5/7/2007	Thibodeau-Elizabeth	Stelmach-Doreen; Staley-Michael	Communication re investigation/inquiry at direction of counsel re AUI's Foster Wheeler claims	Email	Attorney work product doctrine.
154	5/7/2007	Stelmach-Doreen	Thibodeau-Elizabeth	Communication re investigation/inquiry at direction of counsel re AUI's Foster Wheeler claims	Email	Attorney work product doctrine.
155	5/7/2007	Pascale-Bill	Parker-John; Rubin-James; Isely-Catherine; Westover-Michael; Staley-Michael	Teleconference agenda re matter legal assessment and strategy	Email	Attorney-client privilege; Attorney work product doctrine
156	5/7/2007	LeGros-Christopher	Westover-Michael	Communication re legal analysis of AUI's Foster Wheeler claims	Email and Attachment	Attorney work product doctrine
157	5/7/2007	Staley-Michael	Parker-John; Rubin-James; Pascale-Bill; Westover-Michael	Communication re investigation/inquiry at direction of counsel re AUI's Foster Wheeler claims	Memorandum	Attorney-client privilege; Attorney work product doctrine
158	5/7/2007	Pascale-Bill		Notes re legal analysis and assessment of AUI's Foster Wheeler claims	Notes	Attorney work product doctrine
159	5/8/2007	Staley-Michael	Pascale-Bill	Communication re investigation/inquiry at direction of counsel of Foster Wheeler claims to AUI	Email and Attachment	Attorney work product doctrine.
160	5/8/2007	Staley-Michael	Westover-Michael	Communication re legal analysis of AUI's Foster Wheeler claims	Draft letter with handwritten notes	Attorney work product doctrine
161	5/8/2007	Staley-Michael		Communication re legal analysis of AUI's Foster Wheeler claims		Attorney work product doctrine
162	5/9/2007	Staley-Michael	Parker-John	Request for legal advice re legal analysis of AUI's Foster Wheeler claims	Email and Attachment	Attorney-client privilege; Attorney work product doctrine
163	5/9/2007	Stelmach-Doreen	Thibodeau-Elizabeth	Communication re investigation/inquiry at direction of counsel re AUI's Foster Wheeler claims	Email	Attorney work product doctrine.
164	5/9/2007	Thibodeau-Elizabeth	Stelmach-Doreen	Communication re investigation/inquiry at direction of counsel re AUI's Foster Wheeler claims	Email	Attorney work product doctrine.
165	5/9/2007	Staley-Michael		Communication re legal analysis of AUI's Foster Wheeler claims	Draft letter/ Handwritten Notes	Attorney work product doctrine
166	5/9/2007	Staley-Michael		Communication re legal analysis of AUI's Foster Wheeler claims	Draft letter/ Handwritten Notes	Attorney work product doctrine

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167	5/14/2007	Staley-Michael	Parker-John; Falk-Steve; DeMaria-Frank	Email and Attachment	Request for legal advice re legal analysis of AUI's Foster Wheeler claims	Attorney-client privilege; Attorney work product doctrine
168	5/15/2007	Isely-Catherine	Rubin-James; Parker-John; Pascale-Bill; Staley-Michael	Email and Attachment	Providing legal advice re legal analysis of AUI's Foster Wheeler claims	Attorney-client privilege; Attorney work product doctrine
169	5/15/2007	Parker-John	Isely-Catherine; Pascale-Bill; Rubin-James; Staley-Michael	Email and Attachment	Communication re legal advice re legal analysis of AUI's Foster Wheeler claims	Attorney-client privilege; Attorney work product doctrine
170	5/15/2007	Pascale-Bill	Parker-John; Staley-Michael; Westover-Michael	Email	Communication re investigation/inquiry at direction of counsel re AUI's Foster Wheeler claims	Attorney-client privilege; Attorney work product doctrine
171	5/15/2007	Pascale-Bill		Notes	Communication re investigation/inquiry at direction of counsel re AUI's Foster Wheeler claims	Attorney work product doctrine
172	5/15/2007	Thibodeau-Elizabeth	Stelmach-Doreen; Staley-Michael	Email	Communication re investigation/inquiry at direction of counsel re AUI's Foster Wheeler claims	Attorney work product doctrine
173	5/15/2007	Staley-Michael		Draft letter	Communication at direction of counsel re legal analysis of AUI's Foster Wheeler claims	Attorney work product doctrine
174	5/16/2007	Thibodeau-Elizabeth	Salvatore-Carole	Email	Communication re investigation/inquiry at direction of counsel re AUI's Foster Wheeler claims	Attorney work product doctrine
175	5/18/2007	Thibodeau-Elizabeth	Staley-Michael; Stelmach-Doreen	Email	Communication re investigation/inquiry at direction of counsel re AUI's Foster Wheeler claims	Attorney work product doctrine
176	5/18/2007	Salvatore-Carole	Thibodeau-Elizabeth	Email	Communication re investigation/inquiry at direction of counsel re AUI's Foster Wheeler claims	Attorney work product doctrine
177	5/18/2007	Staley-Michael	Thibodeau-Elizabeth	Email	Communication re investigation/inquiry at direction of counsel re AUI's Foster Wheeler claims	Attorney work product doctrine
178	5/30/2007	Staley-Michael	Parker-John; Pascale-Bill; Rubin-James	Email	Request for legal advice re AUI teleconference	Attorney-client privilege
179	5/30/2007	Rubin-James	Staley-Michael; Pascale-Bill; Rubin-James; Parker-John	Email	Communication re request for legal advice re AUI teleconference.	Attorney-client privilege
180	5/30/2007	Parker-John	Rubin-James; Pascale-Bill; Isely-Catherine; Westover-Michael; Weikers-Ann	Email	Communication re request for legal advice re AUI teleconference.	Attorney-client privilege
181	5/30/2007	Pascale-Bill		Handwritten notes	Notes re legal analysis of AUI's Foster Wheeler claims	Attorney-client privilege; Attorney work product doctrine
182	5/31/2007	Isely-Catherine	Parker-John; Westover-Michael; Rubin-James; Pines-Amy	Email	Request for information to provide legal advice re issuance of facultative certificates	Attorney-client privilege
183	5/31/2007	Parker-John	Isely-Catherine; Pines-Amy; Rubin-James; Westover-Michael	Email	Response to request for information to provide legal advice re issuance of facultative certificates	Attorney-client privilege
184	5/31/2007	Rubin-James	Parker-John; Pines-Amy; Isely-Catherine; Westover-Michael	Email	Request for information to provide legal advice re issuance of facultative certificates	Attorney-client privilege
185	5/31/2007	Rubin-James	Parker-John; Pines-Amy; Isely-Catherine; Westover-Michael; Thibodeau-Elizabeth	Email	Response to request for information to provide legal advice re facultative certificates	Attorney-client privilege
186	05-2007	Weikers-Ann		Draft Confidentiality Agreement	Communication re legal analysis in anticipation of AUI audit	Attorney-client privilege; Attorney work product doctrine
187	6/1/2007	Isely-Catherine	Parker-John; Pascale-Bill; Staley-Michael; Weikers-Ann; Westover-Michael; Rubin-James; Pines-Amy	Email and Attachment	Providing legal advice re AUI's Foster Wheeler claims	Attorney-client privilege; Attorney work product doctrine

**TIG Insurance Company's Privilege Log**  
in the matter of AIU Insurance Company v. TIG Insurance Company

3/25/2008

001	11/5/2002	Goepfert-Kurt	Parker-John; Falk-Steve; DeMaria-Frank	Email and Attachment	Communication re legal analysis of KWELM commutation	Attorney-client privilege
188	6/1/2007	Isely-Catherine	Parker-John; Pascale-Bill; Staley-Michael; Weikers-Ann; Westover-Michael; Rubin-James; Pines-Amy	Email	Legal advice re matter assessment	Attorney-client privilege; Attorney work product doctrine
189	6/1/2007	Isely-Catherine	Weikers-Ann; Westover-Michael; Rubin-James; Pines-Amy	Email	Communication re legal advice re AIU's Foster Wheeler claims	Attorney-client privilege; Attorney work product doctrine
190	6/1/2007	Thibodeau-Elizabeth	Parker-John; Pines-Amy; Isely-Catherine; Rubin-James; Westover-Michael	Email	Response to request for information to provide legal advice re issuance of facultative certificates	Attorney-client privilege
191	6/1/2007	Butler Rubin Sallarelli & Boyd	Parker-John; Pascale-William; Staley-Michael; Weikers-Ann; Westover-Michael	Memorandum	Legal advice re AIU's Foster Wheeler claims	
192	6/4/2007	Parker-John	Isely-Catherine; Pines-Amy; Weikers-Ann; Pascale-Bill; Rubin; James; Staley-Michael; Westover-Michael	Email and Attachment	Communication re legal advice re matter assessment and strategy	Attorney-client privilege; Attorney work product doctrine
193	6/4/2007	Parker-John	Isely-Catherine; Pines-Amy; Weikers-Ann; Pascale-Bill; Rubin; James; Staley-Michael; Westover-Michael	Email and Attachment	Communication re legal advice re matter assessment and strategy	Attorney-client privilege; Attorney work product doctrine
194	6/4/2007	Isely-Catherine	Parker-John; Pines-Amy; Weikers-Ann; Pascale-Bill; Isely-Catherine; Rubin-James; Staley-Michael; Westover-Michael	Email	Communication re legal advice re matter assessment and strategy	Attorney-client privilege; Attorney work product doctrine
195	6/4/2007	Staley-Michael	Parker-John; Pines-Amy; Weikers-Ann; Pascale-Bill; Isely-Catherine; Rubin-James; Staley-Michael; Westover-Michael	Email and Attachment	Communication re legal advice re matter assessment and strategy	Attorney-client privilege; Attorney work product doctrine
196	6/4/2007	Pines-Amy	Thibodeau-Elizabeth; Parker-John; Rubin-James; Isely-Catherine; Fornwall-Kelly	Email	Legal assessment re issuance of facultative certificates	Attorney-client privilege; Attorney work product doctrine
197	6/5/2007	Thibodeau-Elizabeth	Pines-Amy; Isely-Catherine; Fornwall-Kelly; James; Fornwall-Kelly	Email	Response to legal assessment re issuance of facultative certificates and jurisdictional issues	Attorney-client privilege
198	6/8/2007	Isely-Catherine	Weikers-Ann; Hermes-Bob; Rubin-James; Parker-John	Email	Communication re legal assessment of facultative certificate issuance and jurisdictional issues	Attorney-client privilege
199	6/8/2007	Weikers-Ann	Hermes-Bob; Isely-Catherine; Parker-John; Isely-Catherine; Hermes-Bob; Parker-John; Rubin-James	Email	Communication re legal assessment of facultative certificate issuance and jurisdictional issues	Attorney-client privilege
200	6/8/2007	Weikers-Ann		Email	Request for legal advice re investigation/inquiry of AIU's Foster Wheeler claims	Attorney-client privilege
201	6/14/2007	Pascale-Bill	Parker-John; Westover-Michael; Staley-Michael	Email	Request for legal advice re investigation/inquiry of AIU's Foster Wheeler claims	Attorney-client privilege
202	6/14/2007	Pascale-Bill	Parker-John; Westover-Michael; Staley-Michael	Email	Notes of communications with counsel re legal advice and strategy in anticipation of AIU audit	Attorney-client privilege; Attorney work product doctrine
203	6/18/2007	Westover-Michael	Pascale-Bill; Parker-John	Email		
204	6/18/2007	Pascale-Bill		Handwritten notes		

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**TIG Insurance Company's Privilege Log**  
in the matter of AIU Insurance Company v. TIG Insurance Company

001	11/5/2002	Goepfert-Kurt	Parker-John; Falk-Steve; DeMaria-Frank	Email and Attachment	Communication re legal analysis of KWELM commutation	Attorney-client privilege
205	6/21/2007	Pascale-Bill	Parker-John; Weikers-Ann; Westover-Michael; Staley-Michael; Rubin-James; Isely-Catherine	Email	Communication re legal analysis and assessment in anticipation of AIU audit	Attorney-client privilege
206	6/21/2007	Parker-John	Pascale-Bill; Weikers-Ann; Isely-Catherine; Rubin-James; Staley-Michael; Westover-Michael	Email	Communication re legal analysis and assessment in anticipation of AIU audit	Attorney-client privilege; Attorney work product doctrine
207	6/21/2007	Buxbaum Loggia	Pascale-Bill; Buxbaum Loggia; Parker-John	Email	Communication re legal analysis and assessment in anticipation of AIU audit	Attorney-client privilege; Attorney work product doctrine
208	6/21/2007	Pascale-Bill	Loggia-Joe	Email	Communication re legal analysis and assessment in anticipation of AIU audit	Attorney-client privilege; Attorney work product doctrine
209	6/25/2007	Weitzner-Steve	Loggia-Joe	Email	Communication at direction of counsel re legal analysis and assessment in anticipation of AIU audit	Attorney-client privilege; Attorney work product doctrine
210	6/25/2007	Pascale-Bill	Westover-Michael	Email	Request for legal advice re legal analysis of AIU's Foster Wheeler claims	Attorney-client privilege; Attorney work product doctrine
211	6/25/2007	Staley-Michael	Pascale-Bill; Parker-John	Email and Attachment	Communication re investigation/inquiry at direction of counsel re AIU's Foster Wheeler claims	Attorney-client privilege; Attorney work product doctrine
212	6/26/2007	Stelmach-Doreen	Loggia-Joe	Letter	Legal assessment re facultative certificate issuance and jurisdictional issues	Attorney-client privilege; Attorney work product doctrine
213	6/26/2007	Pines-Amy	Parker-John; Weikers-Ann; Pascale-Bill; Rubin-James; Staley-Michael; Westover-Michael; LeGros-Christopher; Rubin-James; Isely-Catherine; Fornwall-Kelly	Email and Attachment Handwritten Notes annotating communication with AIU (otherwise produced)	Notes regarding legal analysis and assessment at direction of counsel of AIU's Foster Wheeler claims.	Attorney-client privilege
214	6/27/2007	Pascale-Bill	Loggia-Joe	Email and Attachment	Communication re legal analysis and assessment in anticipation of AIU audit	Attorney-client privilege
215	6/28/2007	Pascale-Bill	Weikers-Ann	Email	Communication re legal analysis and assessment in anticipation of AIU audit	Attorney-client privilege
216	6/28/2007	Weikers-Ann	Pascale-Bill	Handwritten Notes annotating communication with AIU (otherwise produced)	Notes regarding legal analysis and assessment at direction of counsel of AIU's Foster Wheeler claims.	Attorney-client privilege; Attorney work product doctrine
217	6/28/2007	Pascale-Bill	Weikers-Ann; Pascale-Bill; Loggia-Joe; Isely-Catherine; Rubin-James	Email	Communication re request for legal advice re AIU audit	Attorney-client privilege; Attorney work product doctrine
218	6/28/2007	Loggia-Joe	Pascale-Bill; Loggia-Joe; Isely-Catherine; Parker-John; Rubin-James	Email	Communication re request for legal advice re AIU audit	Attorney-client privilege; Attorney work product doctrine
219	6/28/2007	Weikers-Ann	Pascale-Bill; Loggia-Joe; Isely-Catherine; Parker-John; Rubin-James	Email and Attachment	Communication re legal analysis and assessment in anticipation of AIU audit	Attorney-client privilege
220	6/29/2007	Weikers-Ann	Pascale-Bill; Parker-John	Email	Communication re legal analysis and assessment in anticipation of AIU audit	Attorney-client privilege; Attorney work product doctrine
221	6/29/2007	Pascale-Bill	Weikers-Ann; Parker-John	Email	Communication re legal analysis and assessment in anticipation of AIU audit	Attorney-client privilege; Attorney work product doctrine
222	6/29/2007	Weikers-Ann	Pascale-Bill; Parker-John	Email	Communication re legal analysis and assessment in anticipation of AIU audit	Attorney-client privilege; Attorney work product doctrine
223	6/29/2007	Weikers-Ann	Pascale-Bill; Parker-John	Email with Handwritten Notes and Attachment	Communication re legal analysis and assessment in anticipation of AIU audit	Attorney-client privilege

**TIG Insurance Company's Privilege Log**  
in the matter of AIU Insurance Company v. TIG Insurance Company

3/25/2008

001	11/5/2002	Goepfert-Kurt	Parker-John; Falk-Steve; DeMaria-Frank	Email and Attachment	Communication re legal analysis of KWELM commutation	Attorney-client privilege; Attorney work product doctrine
224	6/29/2007	Weikers-Ann	Isely-Catherine; Rubin-James; Parker-John	Email	Communication re request for legal advice re AIU audit	Attorney-client privilege; Attorney work product doctrine
225	07/2007	Pascale-Bill		Notes	Notes re AIU audit	Attorney-client privilege; Attorney work product doctrine
226	07/2007	Pascale-Bill	Butler Rubin Saltarelli & Boyd	Email	Notes re AIU audit	Attorney-client privilege; Attorney work product doctrine
227	7/2/2007	Hall-Jennifer	Pascale-Bill; Weikers-Ann	Email	Communication re confidentiality agreement for AIU audit	Attorney-client privilege; Attorney work product doctrine
228	7/2/2007	Weikers-Ann	Pascale-Bill; Loggia-Joe; Rubin-James; Isely-Catherine	Email	Communication re confidentiality agreement for AIU audit	Attorney-client privilege; Attorney work product doctrine
229	7/2/2007	Pascale-Bill	Loggia-Joe	Email	Communication re legal analysis and assessment in anticipation of AIU audit	Attorney-client privilege; Attorney work product doctrine
230	7/2/2007	Pascale-Bill	Weikers-Ann	Email	Communication re legal analysis and assessment in anticipation of AIU audit	Attorney-client privilege
231	7/2/2007	Weikers-Ann	Pascale-Bill	Email	Communication re legal analysis and assessment in anticipation of AIU audit	Attorney-client privilege
232	7/2/2007	Pascale-Bill	Weikers-Ann; Parker-John	Email and Attachment	Communication re legal analysis and assessment in anticipation of AIU audit	Attorney-client privilege; Attorney work product doctrine
233	7/2/2007	Pascale-Bill		Handwritten Notes annotating communication with AIU (otherwise produced)	Notes regarding legal analysis and assessment at direction of counsel of AIU's Foster Wheeler claims.	Attorney work product doctrine
234	7/5/2007	Weikers-Ann	Pascale-Bill; Loggia-Joe	Email	Communication re legal analysis and assessment in anticipation of AIU audit.	Attorney-client privilege; Attorney work product doctrine
235	7/5/2007	Loggia-Joe	Pascale-Bill	Email	Communication re legal analysis and assessment in anticipation of AIU audit.	Attorney-client privilege; Attorney work product doctrine
236	7/5/2007	Pascale-Bill	Weikers-Ann; Parker-John	Email and Attachment	Requesting legal advice re AIU communication	Attorney-client privilege
237	7/5/2007	Pascale-Bill		Handwritten Notes annotating communication with AIU (otherwise produced)	Notes regarding legal analysis and assessment at direction of counsel of AIU audit	
238	7/6/2007	Hall-Jennifer	Weikers-Ann; Pascale-Bill; Loggia-Joe	Email and Attachment	Communication re legal assessment and analysis in anticipation of AIU audit.	Attorney work product doctrine
239	7/9/2007	Loggia-Joe	Rubin-James; Parker-John; Buxbaum Loggia	Email	Request for legal advice re AIU audit	Attorney-client privilege; Attorney work product doctrine
240	7/9/2007	Pascale-Bill		Notes	Notes re AIU audit at direction of counsel	Attorney work product doctrine
241	7/9/2007	Pascale-Bill		Draft Letter	Draft communication to AIU re AIU's Foster Wheeler claims at direction of counsel	Attorney work product doctrine
242	7/10/2007	Westover-Michael	Loggia-Joe; Belcove-Ira; Parker-John; Rubin-James; Weikers-Ann	Email	Communication re conducting legal analysis and assessment of AIU audit with counsel	Attorney-client privilege; Attorney work product doctrine
243	7/10/2007	Loggia-Joe	Westover-Michael	Email	Communication re conducting legal analysis and assessment of AIU audit with counsel	Attorney-client privilege; Attorney work product doctrine
244	7/10/2007	Westover-Michael	Loggia-Joe; Weikers-Ann; Parker-John	Email	Communication re conducting legal analysis and assessment of AIU audit with counsel	Attorney-client privilege; Attorney work product doctrine
245	7/10/2007	Rubin-James	Rubin-James; Loggia-Joe; Parker-John	Email	Response to request for legal advice re AIU audit	Attorney-client privilege; Attorney work product doctrine
246	7/10/2007	Rubin-James	Loggia-Joe; Parker-John	Email	Response to request for legal advice re AIU audit	Attorney-client privilege; Attorney work product doctrine
247	7/10/2007	Parker-John	Loggia-Joe; Rubin-James	Email	Communication re conducting legal analysis and assessment of AIU audit with counsel	Attorney-client privilege; Attorney work product doctrine

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**TIG Insurance Company's Privilege Log**  
in the matter of AUI Insurance Company v. TIG Insurance Company

001	11/5/2002	Goepfert-Kurt	Parker-John; Falk-Slave; DeMaria-Frank	Email and Attachment	Communication re legal analysis of KWELM commutation	Attorney-client privilege
248	7/10/2007	Loggia-Joe	Rubin-James; Parker-John	Email	Request for legal advice re AUI audit	Attorney-client privilege; Attorney work product doctrine
249	7/10/2007	Rubin-James	Loggia-Joe; Parker-John	Email	Response to request for legal advice re AUI audit	Attorney-client privilege; Attorney work product doctrine
250	7/10/2007	Westover-Michael	Buxbaum Loggia; Loggia-Joe; Weikers-Ann; Parker-John	Email	Communication re conducting legal analysis and assessment of AUI audit with counsel	Attorney-client privilege; Attorney work product doctrine
251	7/10/2007	Buxbaum Loggia	Westover-Michael	Email	Communication re conducting legal analysis and assessment of AUI audit with counsel	Attorney-client privilege; Attorney work product doctrine
252	7/10/2007	Westover-Michael	Loggia-Joe; Belcove-Ira; Parker-John; Rubin-James; Weikers-Ann	Email	Communication re conducting legal analysis and assessment of AUI audit with counsel	Attorney-client privilege; Attorney work product doctrine
253	7/10/2007	Parker-John	Loggia-Joe; Rubin-James	Email and Attachment	Response to request for legal advice re AUI audit	Attorney-client privilege
254	7/11/2007	Weikers-Ann	Pascale-Bill; Rubin-James; Isely-Catherine	Email	Communication re request for legal advice re AUI audit	Attorney-client privilege; Attorney work product doctrine
255	7/12/2007	Rubin-James	Weikers-Ann; Isely-Catherine	Email and Attachment	Communication re request for legal advice re AUI audit	Attorney-client privilege
256	7/26/2007	Pascale-Bill	Rubin-James; Isely-Catherine; Parker-John; Weikers-Ann; Staley-Michael; Lemire-Maureen	Email	Communication re conducting legal analysis and assessment of AUI audit with counsel	Attorney-client privilege
257	7/26/2007	Pascale-Bill	Rubin-James; Isely-Catherine; Parker-John; Weikers-Ann; Staley-Michael; Lemire-Maureen	Email	Communication re conducting legal analysis and assessment of AUI audit with counsel	Attorney-client privilege
258	7/26/2007	Isely-Catherine	Pascale-Bill; Parker-John; Weikers-Ann; Staley-Michael; Lemire-Maureen; Rubin-James	Email	Communication re conducting legal analysis and assessment of AUI audit with counsel	Attorney-client privilege
259	7/27/2007	Pascale-Bill	Parker-John; Weikers-Ann; Staley-Michael; Lemire-Maureen	Email	Communication re conducting legal analysis and assessment of AUI audit with counsel	Attorney-client privilege
260	7/27/2007	Pascale-Bill	Isely-Catherine; Parker-John; Weikers-Ann; Staley-Michael; Lemire-Maureen; Rubin-James	Email	Communication re conducting legal analysis and assessment of AUI audit with counsel	Attorney-client privilege
261	7/27/2007	Pascale-Bill	Parker-John	Email	Communication re conducting legal analysis and assessment of AUI audit with counsel	Attorney-client privilege
262	7/27/2007	Pascale-Bill	Isely-Catherine; Parker-John; Weikers-Ann; Staley-Michael; Lemire-Maureen; Rubin-James	Email with Handwritten Notes and Attachment	Communication re legal analysis of AUI's Foster Wheeler claims	Attorney-client privilege
263	7/30/2007	Weikers-Ann	Rubin-James; Isely-Catherine; Parker-John; Pascale-Bill	Email	Communication re request for legal advice re late notice defense	Attorney work product doctrine
264	7/31/2007	Weikers-Ann	Westover-Michael	Email	Communication re legal analysis and assessment of KWELM and BFMIC communications	Attorney-client privilege
265	7/31/2007	Pascale-Bill	Parker-John; Weikers-Ann; Rubin-James; Isely-Catherine	Email and Attachment	Communication re request for legal advice re AUI audit	Attorney-client privilege; Attorney work product doctrine
266	7/31/2007	Weikers-Ann	Gilliland-Donna	Email	Communication re legal analysis and assessment of communications	Attorney-client privilege; Attorney work product doctrine
267	7/31/2007	Isely-Catherine	Weikers-Ann	Email	Communication re request for legal assessment of communications	Attorney-client privilege; Attorney work product doctrine
268	7/31/2007	Weikers-Ann	Isely-Catherine	Email	Communication re request for legal assessment of communications	Attorney-client privilege; Attorney work product doctrine
269	7/31/2007	Isely-Catherine	Weikers-Ann	Email	Communication re request for legal assessment of communications	Attorney-client privilege; Attorney work product doctrine
270	8/1/2007	Pascale-Bill		Endorsement with Handwritten notes	Notes re legal analysis of AUI's Foster Wheeler claims at direction of counsel	Attorney work product doctrine
271	8/1/2007	Westover-Michael	Weikers-Ann	Email	Communication re legal analysis and assessment of KWELM and BFMIC communications	Attorney-client privilege

**TIG Insurance Company's Privilege Log**  
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3/25/2008

001	11/5/2002	Gospfert-Kurt	Parker-John; Falk-Steve; DeMaria-Frank	Email and Attachment	Communication re legal analysis of KWELM commutation	Attorney-client privilege; Attorney work product doctrine
272	8/1/2007	Gilliland-Donna	Weikers-Ann	Email	Communication re legal analysis and assessment of commutations	Attorney-client privilege; Attorney work product doctrine
273	8/1/2007	Weikers-Ann	Gilliland-Donna	Email	Communication re legal analysis and assessment of commutations	Attorney-client privilege; Attorney work product doctrine
274	8/2/2007	Meier-Renee	Staley-Michael	Email	Communication re investigation/inquiry at direction of counsel re AIU's Foster Wheeler claims	Attorney work product doctrine
275	8/2/2007	Meier-Renee	Staley-Michael	Email	Communication re investigation/inquiry at direction of counsel re AIU's Foster Wheeler claims	Attorney work product doctrine
276	8/2/2007	Staley-Michael	File	Memorandum	Communication re investigation/inquiry at direction of counsel re AIU's Foster Wheeler claims	Attorney-client privilege; Attorney work product doctrine
277	8/3/2007	Staley-Michael	Pascale-Bill	Email	Communication re investigation/inquiry at direction of counsel re AIU's Foster Wheeler claims	Attorney work product doctrine
278	12-22-02 5/7/2007	Parker-John	DeMaria-Frank	Incomplete draft settlement agreement with Handwritten Notes	Communication re legal analysis and assessment of KWELM commutation agreement	Attorney-client privilege
279	5/31/2007 6/19/2007 7/17/2007 8/9/2007	Thibodeau-Elizabeth		Handwritten notes	Notes re legal analysis and assessment with counsel re AIU's Foster Wheeler claims	Attorney-client privilege; Attorney work product doctrine

## In the matter of AIU Insurance Company v. TIG Insurance Company

Individual Listed on Log	Attorney/Non-Attorney	Title/Department Attorneys	Employer Entity on Date of Communication
Alvino-Ginamarie	Non-Attorney		Riverstone
Baldwin-Sara	Non-Attorney		Riverstone
Beaudoin-Nancy	Non-Attorney		Riverstone
Becker-Jones-Clive	Non-Attorney		Riverstone
Belcove-Ira	Attorney	Partner	Butler Rubin Saltarelli & Boyd
DeMaria-Frank	Non-Attorney		Riverstone
Falk-Steve	Non-Attorney		Riverstone
Fornwall-Kelly	Non-Attorney		Butler Rubin Saltarelli & Boyd
Gilliand-Donna	Non-Attorney		Riverstone
Goepfert-Kurt	Non-Attorney		Riverstone
Gossett-Bob	Non-Attorney		Riverstone
Hall-Jennifer	Non-Attorney		Buxbaum Loggia
Hanna-Michael	Non-Attorney		Riverstone
Hermes-Bob	Attorney	Partner	Butler Rubin Saltarelli & Boyd
Isely-Catherine	Attorney	Partner	Butler Rubin Saltarelli & Boyd
LeBlanc-Sandra	Non-Attorney		Riverstone
LeGros-Christopher	Non-Attorney		Riverstone
Lemire-Maureen	Non-Attorney		Riverstone
Loggia-Joe	Non-Attorney		Buxbaum Loggia
McCarthy-Linda	Non-Attorney		Riverstone
Meier-Renee	Non-Attorney		Riverstone
	Attorney	Senior Vice President - Reinsurance Reinsurance Counsel	
Parker-John			Riverstone
Pascale-Bill	Non-Attorney		Riverstone
Pines-Amy	Attorney	Associate	Butler Rubin Saltarelli & Boyd
Rubin-James	Attorney	Partner	Butler Rubin Saltarelli & Boyd
Salvatore-Carole	Non-Attorney		Riverstone
Shiffer-Kristina	Non-Attorney		Riverstone
Staley-Michael	Non-Attorney		Riverstone
Stelmach-Doreen	Non-Attorney		Riverstone
Thibodeau-Elizabeth	Non-Attorney		Riverstone
	Attorney	Assistant Vice President Deputy Reinsurance Counsel	
Weikers-Ann			Riverstone
Weitzner-Steve	Non-Attorney		Buxbaum Loggia
Westover-Michael	Non-Attorney		Riverstone

# **EXHIBIT N**

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TIG Insurance Company's Redaction Log  
in the matter of AIG Insurance Company v. TIG Insurance Company

Prefix	Begin Bates	End Bates	Date	Author	Recipients	Document Type	Subject of Redaction	Legal Basis for Withholding
TIG	325		9/17/1981			Notes	Other insured information	Non-responsive
TIG	541		10/27/1980			Notes	Other insured information	Non-responsive
TIG	625					Notes	Other insured information	Non-responsive
TIG	838					Notes	Other insured information	Non-responsive
TIG	864		9/17/1981			Notes	Other insured information	Non-responsive
TIG	776					Notes	Other insured information	Non-responsive
TIG	803					Notes	Other insured information	Non-responsive
TIG	868					Notes	Other insured information	Non-responsive
TIG	886					Notes	Other insured information	Non-responsive
TIG	946					Notes	Other insured information	Non-responsive
TIG	975		10/18/1978			Notes	Other insured information	Non-responsive
TIG	1081					Notes	Other insured information	Non-responsive
TIG	1082					Notes	Other insured information	Non-responsive
TIG	1111		10/27/1980			Notes	Other insured information	Non-responsive
TIG	1143					Notes	Other insured information	Non-responsive
TIG	1316					Notes	Other insured information	Non-responsive
TIG	1340					Notes	Other insured information	Non-responsive
TIG	3403					Notes	Other insured information	Non-responsive
TIG	3428		8/21/2001			Spreadsheet	Other insured information	Non-responsive
TIG	3453	3451	11/8/2001			Spreadsheet	Other insured information	Non-responsive
TIG	3479	3478	12/18/2001	DeMaria-Frank	Corver-Paul, Langridge-Mark, Pascale-Bill	Email	Other insured information	Non-responsive
TIG	3532	3480	2/29/2002	DeMaria-Frank	Gibbs-Dennis, Becker-Jones-Olive	Email	Other insured information	Non-responsive
TIG	3535	3556	8/21/2001			Spreadsheet	Other insured information	Non-responsive
TIG	3627	3631	5/28/2002	Corver-Paul	DeMaria-Frank, Langridge-Mark	Spreadsheet	Other insured information	Non-responsive
TIG	3670	3680	5/28/2002	Corver-Paul	DeMaria-Frank, Langridge-Mark	Spreadsheet	Other insured information	Non-responsive
TIG	3683	3730				Spreadsheet	Other insured information	Non-responsive
TIG	3732	3764	4/23/2002			Spreadsheet	Other insured information	Non-responsive
TIG	3765	3800	4/24/2002			Spreadsheet	Other insured information	Non-responsive
TIG	3803	3834				Spreadsheet	Other insured information	Non-responsive
TIG	3837	3858	4/26/2002			Spreadsheet	Other insured information	Non-responsive
TIG	3869	3872	5/28/2002	Corver-Paul	DeMaria-Frank, Langridge-Mark	Spreadsheet	Other insured information	Non-responsive
TIG	3873	3920	5/28/2002			Spreadsheet	Other insured information	Non-responsive
TIG	3850	3854	5/14/2002			Spreadsheet	Other insured information	Non-responsive
TIG	3856	3861	9/2/2002	DeMaria-Frank	Frugleton-Paul	Spreadsheet	Other insured information	Non-responsive
TIG	3862	3863	10/14/2002	Corver-Paul	DeMaria-Frank, Langridge-Mark	Email	Other insured information	Non-responsive
TIG	3864	3865	10/14/2002	Corver-Paul	DeMaria-Frank, Langridge-Mark	Email	Other insured information	Non-responsive
TIG	3868	3867	10/14/2002	Corver-Paul	DeMaria-Frank, Langridge-Mark	Email	Other insured information	Non-responsive
TIG	3869	3871	10/14/2002	Corver-Paul	DeMaria-Frank, Langridge-Mark	Email	Other insured information	Non-responsive
TIG	3872	3875	10/14/2002	Corver-Paul	DeMaria-Frank, Langridge-Mark	Email	Other insured information	Non-responsive
TIG	3876	3878	10/14/2002	Corver-Paul	DeMaria-Frank, Langridge-Mark	Email	Other insured information	Non-responsive
TIG	3878	3882	10/14/2002	Corver-Paul	DeMaria-Frank, Langridge-Mark	Email	Other insured information	Non-responsive
TIG	3893	3897	10/16/2002	DeMaria-Frank	Falk-Stevie, Gopflast-Kurt, Camoselli-Nina;	Email with attachment	Other insured information	Non-responsive
TIG	3895	3897	10/16/2002	DeMaria-Frank	Rowland-Bill	Letter	Other insured information	Non-responsive
TIG	3898	3892	10/16/2002	DeMaria-Frank	Falk-Stevie, Gopflast-Kurt, Camoselli-Nina;	Email with attachment	Other insured information	Non-responsive
TIG	3899	3892	10/16/2002	DeMaria-Frank	Rowland-Bill	Letter	Other insured information	Non-responsive

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**TIG Insurance Company's Redaction Log**  
in the matter of All Insurance Company v. TIG Insurance Company

Prefix	Begin Bates	End Bates	Date	Author	Recipients	Document Type	Subject of Redaction	Legal Basis for Withholding
TIG	3993	3994	10/18/2002	DeMaria-Frank	Caoselli-Nina; Goepfert-Kurt; Falk-Slave;	Email	Other insured information	Non-responsive
TIG	4011	4018	11/7/2002	Goepfert-Kurt	Rowland-Bill; DeMaria-Frank; Falk-Slave;	Email with attachment	Other insured information	Non-responsive
TIG	4011	4018	11/5/2002	Goepfert-Kurt	Taylor-David; Cover-Paul; Beaudoin-Nancy	Email with attachment	Other insured information	Non-responsive
TIG	4013	4018	10/24/2002	Goepfert-Kurt	Rowland-Bill; DeMaria-Frank; Falk-Slave;	Report	Other insured information	Non-responsive
TIG	4022	4029	11/6/2002	Beaudoin-Nancy	Taylor-David; Cover-Paul; Beaudoin-Nancy	Email with attachment	Other insured information	Non-responsive
TIG	4022	4029	11/7/2002	Goepfert-Kurt	Goepfert-Peter; Ostrowick-Dave	Email with attachment	Other insured information	Non-responsive
TIG	4024	4029	11/5/2002	Goepfert-Kurt	Rowland-Bill; DeMaria-Frank; Falk-Slave;	Email with attachment	Other insured information	Non-responsive
TIG	4024	4029	10/24/2002	Goepfert-Kurt	Taylor-David; Cover-Paul; Beaudoin-Nancy	Report	Other insured information	Non-responsive
TIG	4049	4051	11/20/2002	Goepfert-Kurt	Taylor-David; Cover-Paul; Beaudoin-Nancy	List of Questions	Other insured information	Non-responsive
TIG	4055	4059	11/21/2002	Radley-Richard	List of Questions	Email	Other insured information	Non-responsive
TIG	4062	4063	12/2/2002	Gilliland-Donna	Langridge-Mark	Email	Other insured information	Non-responsive
TIG	4063	4063	12/2/2002	Gilliland-Donna	Langridge-Mark	Email	Other insured information	Non-responsive
TIG	4269	4271	1/2/2003	Cover-Paul	DeMaria-Frank; Parker-John; Head-Chris;	Email	Other insured information	Non-responsive
TIG	4275	4277	1/2/2003	Cover-Paul	DeMaria-Frank; Parker-John; Head-Chris;	Email	Other insured information	Non-responsive
TIG	4333	4363	1/14/2003	Cover-Paul	Clark-George	Agreement	Other insured information	Non-responsive
TIG	4365	4366	12/2/2002	Gilliland-Donna	Langridge-Mark	Email	Other insured information	Non-responsive
TIG	4371	4401	12/3/2003	Gilliland-Donna	Langridge-Mark	Agreement	Other insured information	Non-responsive
TIG	4425	4425	12/2/2002	Gilliland-Donna	DeMaria-Frank	Email	Other insured information	Non-responsive
TIG	4426	4523	1/30/2003	Gilliland-Donna	DeMaria-Frank	Spreadsheet	Other insured information	Non-responsive
TIG	4525	4563	2/5/2003	Gilliland-Donna	DeMaria-Frank	Agreement	Other insured information	Non-responsive
TIG	4566	4595	2/14/2003	Gilliland-Donna	DeMaria-Frank	Agreement	Other insured information	Non-responsive
TIG	4598	4627	2/14/2003	Gilliland-Donna	DeMaria-Frank	Agreement	Other insured information	Non-responsive
TIG	4634	4658	2/27/2003	Gilliland-Donna	DeMaria-Frank	Agreement	Other insured information	Non-responsive
TIG	4729	4732	3/18/2003	Gilliland-Donna	DeMaria-Frank	Agreement	Other insured information	Non-responsive
TIG	4746	4746	4/23/2003	Gilliland-Donna	DeMaria-Frank	Email	Other insured information	Non-responsive
TIG	4747	4747	4/23/2003	Gilliland-Donna	DeMaria-Frank	Email	Other insured information	Non-responsive
TIG	4749	4751	4/23/2003	Gilliland-Donna	DeMaria-Frank	Email	Other insured information	Non-responsive
TIG	4753	4754	4/23/2003	Gilliland-Donna	DeMaria-Frank	Email	Other insured information	Non-responsive
TIG	4759	4759	4/23/2003	Gilliland-Donna	DeMaria-Frank	Email	Other insured information	Non-responsive
TIG	4764	4794	10/1/2003	DeMaria-Frank	Taylor-David; Adamson-Mike; Cover-Paul;	Email with attachment	Other insured information	Non-responsive
TIG	4796	4806	10/1/2003	DeMaria-Frank	Fingelson-Paul; Gilliland-Donna	Email with attachment	Other insured information	Non-responsive
TIG	4807	4818	10/1/2003	DeMaria-Frank	Taylor-David; Adamson-Mike; Cover-Paul;	Email with attachment	Other insured information	Non-responsive
TIG	4810	4815	11/3/2004	Fingelson-Paul	Fingelson-Paul; Gilliland-Donna	Email	Other insured information	Non-responsive
TIG	4815	4815	11/3/2004	DeMaria-Frank	Fingelson-Paul; Gilliland-Donna	Email with attachment	Other insured information	Non-responsive
TIG	5004	5035	4/28/2002	DeMaria-Frank	Gilliland-Donna	Spreadsheet	Other insured information	Non-responsive
TIG	5038	5069	4/29/2002	DeMaria-Frank	Gilliland-Donna	Spreadsheet	Other insured information	Non-responsive
TIG	5072	5105	5/14/2002	DeMaria-Frank	Gilliland-Donna	Spreadsheet	Other insured information	Non-responsive
TIG	5107	5138	5/14/2002	DeMaria-Frank	Gilliland-Donna	Spreadsheet	Other insured information	Non-responsive
TIG	5141	5174	5/24/2002	Cover-Paul	DeMaria-Frank; Langridge-Mark	Spreadsheet	Other insured information	Non-responsive
TIG	5175	5226	5/28/2002	Cover-Paul	DeMaria-Frank; Langridge-Mark	Email with attachment	Other insured information	Non-responsive
TIG	5176	5226	5/28/2002	Cover-Paul	DeMaria-Frank; Langridge-Mark	Spreadsheet	Other insured information	Non-responsive

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Prefix	Begin Bates	End Bates	Date	Author	Recipients	Document Type	Subject of Redaction	Legal Basis for Withholding
TIG	5227	5278	5/28/2002	Conver-Paul	DeMaria-Frank; Langridge-Mark	Email with attachment	Other insured information	Non-responsive
TIG	5231	5278	5/28/2002			Spreadsheet	Other insured information	Non-responsive
TIG	5279	5330	5/28/2002	Conver-Paul	DeMaria-Frank; Langridge-Mark	Email with attachment	Other insured information	Non-responsive
TIG	5283	5330	5/28/2002			Spreadsheet	Other insured information	Non-responsive
TIG	5332	5362	6/6/2002			Spreadsheet	Other insured information	Non-responsive
TIG	5363	5414	5/28/2002	Conver-Paul	DeMaria-Frank; Langridge-Mark	Email with attachment	Other insured information	Non-responsive
TIG	5367	5414	5/28/2002			Spreadsheet	Other insured information	Non-responsive
TIG	5417	5448	6/14/2002			Spreadsheet	Other insured information	Non-responsive
TIG	5451	5482	4/28/2002			Spreadsheet	Other insured information	Non-responsive
TIG	5484	5488	10/16/2002	Conver-Paul	DeMaria-Frank	Letter	Other insured information	Non-responsive
TIG	5487	5491	10/16/2002	DeMaria-Frank	Falk-Stave; Goepfert-Kurt; Caroselli-Nina; Rowland-Bill	Email	Other insured information	Non-responsive
TIG	5489	5491	10/16/2002	Conver-Paul	DeMaria-Frank	Letter	Other insured information	Non-responsive
TIG	5492	5496	10/16/2002	Falk-Stave	DeMaria-Frank; Rowland-Bill; Goepfert-Kurt; Caroselli-Nina; Wilczek-Thomas; Lerner-Maureen; Becker-Jones-Olive; DelCarpio-Carlos	Email	Other insured information	Non-responsive
TIG	5492	5496	10/16/2002	DeMaria-Frank	Falk-Stave; Goepfert-Kurt; Caroselli-Nina; Rowland-Bill	Email	Other insured information	Non-responsive
TIG	5494	5496	10/16/2002	Conver-Paul	DeMaria-Frank	Letter	Other insured information	Non-responsive
TIG	5497	5498	10/18/2002	DeMaria-Frank	Caroselli-Nina; Goepfert-Kurt; Falk-Stave; Wilczek-Thomas	Email	Other insured information	Non-responsive
TIG	5499	5500	10/18/2002	DeMaria-Frank	Caroselli-Nina; Goepfert-Kurt; Falk-Stave; Wilczek-Thomas	Email	Other insured information	Non-responsive
TIG	5501	5502	11/5/2002	Goepfert-Kurt	Rowland-Bill; Ostrowski-Dave; Cooper-Peter; DeMaria-Frank; Falk-Stave	Email	Other insured information	Non-responsive
TIG	5503	5506	11/20/2002			List of Questions	Other insured information	Non-responsive
TIG	5507	5510	11/20/2002			List of Questions	Other insured information	Non-responsive
TIG	5513	5515	11/20/2002			List of Questions	Other insured information	Non-responsive
TIG	5517	5521	11/21/2002			List of Questions	Other insured information	Non-responsive
TIG	5524	5620	11/22/2003			Agreement	Other insured information	Non-responsive
TIG	5622	5656	12/02/2003			Spreadsheet	Other insured information	Non-responsive
TIG	5658	5691	12/12/2003			Spreadsheet	Other insured information	Non-responsive
TIG	5694	5767	12/4/2003			Agreement	Other insured information	Non-responsive
TIG	5781	5884	12/4/2003			Agreement	Other insured information	Non-responsive
TIG	5889	5962	12/7/2003			Agreement	Other insured information	Non-responsive
TIG	5967	6060	12/7/2003			Agreement	Other insured information	Non-responsive
TIG	6065	6178	12/7/2003			Agreement	Other insured information	Non-responsive
TIG	6184	6277	12/7/2003			Agreement	Other insured information	Non-responsive
TIG	6282	6375	12/7/2003			Agreement	Other insured information	Non-responsive
TIG	6377	6472	12/7/2003			Agreement	Other insured information	Non-responsive
TIG	6475	6572	12/7/2003			Agreement	Other insured information	Non-responsive
TIG	6574	6665	2/4/2003			Agreement	Other insured information	Non-responsive
TIG	6667	6692	2/5/2003			Agreement	Other insured information	Non-responsive
TIG	6694	6777	2/6/2003			Agreement	Other insured information	Non-responsive
TIG	6779	6786	3/19/2003			Agreement	Other insured information	Non-responsive
TIG	6787	6838	5/28/2002	Conver-Paul	DeMaria-Frank; Langridge-Mark	Email with attachment	Other insured information	Non-responsive
TIG	6791	6838	10/14/2003			Agreement	Other insured information	Non-responsive
TIG	6841	6840	2/12/2004			Agreement	Other insured information	Non-responsive
TIG	6943	7041	3/31/2004			Agreement	Other insured information	Non-responsive
TIG	7043		10/26/2003			Spreadsheet	Other insured information	Non-responsive

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Prefix	Begin Bates	End Bates	Date	Author	Recipients	Document Type	Subject of Reduction	Legal Basis for Withholding
TIG	7045	7049	3/31/2001			Spreadsheet	Other insured information	Non-responsive
TIG	7050	7054				Spreadsheet	Other insured information	Non-responsive
TIG	7055					Spreadsheet	Other insured information	Non-responsive
TIG	7056	7107	5/28/2002	Conner-Paul	DeMaria-Frank; Langridge-Mark	Email	Other insured information	Non-responsive
TIG	7060	7107				Spreadsheet	Other insured information	Non-responsive
TIG	7109	7159	5/28/2002	Conner-Paul	DeMaria-Frank; Langridge-Mark	Email	Other insured information	Non-responsive
TIG	7112	7159				Spreadsheet	Other insured information	Non-responsive
TIG	7160	7210	5/28/2002	Conner-Paul	DeMaria-Frank; Langridge-Mark	Email	Other insured information	Non-responsive
TIG	7164	7210				Spreadsheet	Other insured information	Non-responsive
TIG	7211	7282	5/28/2002	Conner-Paul	DeMaria-Frank; Langridge-Mark	Email	Other insured information	Non-responsive
TIG	7215	7282				Spreadsheet	Other insured information	Non-responsive
TIG	7283	7284	2/11/2004	Mesquita-Angel	DeMaria-Frank; Lectora-Lara	Email	Other retroinsurer commutation information	Non-responsive
TIG	7285	7284	2/11/2004	DeMaria-Frank	Mesquita-Angel; Lectora-Lara	Email	Other retroinsurer commutation information	Non-responsive
TIG	7286	7286	2/11/2004	Mesquita-Angel	Gilliland-Donna; Lectora-Lara	Email	Other retroinsurer commutation information	Non-responsive
TIG	7287	7286	2/11/2004	DeMaria-Frank	Mesquita-Angel; Lectora-Lara	Email	Other retroinsurer commutation information	Non-responsive
TIG	7288	7286	2/11/2004	Gilliland-Donna	Mesquita-Angel; Lectora-Lara	Email	Other retroinsurer commutation information	Non-responsive
TIG	7289	7289	2/11/2004	Mesquita-Angel	DeMaria-Frank; Lectora-Lara	Email	Other retroinsurer commutation information	Non-responsive
TIG	7290	7289	2/11/2004	DeMaria-Frank	Mesquita-Angel; Lectora-Lara	Email	Other retroinsurer commutation information	Non-responsive
TIG	7291	7289	2/11/2004	Mesquita-Angel	Gilliland-Donna; Lectora-Lara	Email	Other retroinsurer commutation information	Non-responsive
TIG	7292	7289	2/12/2004	Gilliland-Donna	Mesquita-Angel; Pascale-Bill; Lectora-Lara	Email	Other retroinsurer commutation information	Non-responsive
TIG	7293	7289				Spreadsheet	Other retroinsurer commutation information	Non-responsive
TIG	7297	7295	2/12/2004	Mesquita-Angel	Lectora-Lara	Email	Other retroinsurer commutation information	Non-responsive
TIG	7270	7272	2/11/2004	Mesquita-Angel	DeMaria-Frank; Lectora-Lara	Email	Other retroinsurer commutation information	Non-responsive
TIG	7270	7272	2/11/2004	DeMaria-Frank	Mesquita-Angel; Lectora-Lara	Email	Other retroinsurer commutation information	Non-responsive
TIG	7270	7272	2/11/2004	Mesquita-Angel	Gilliland-Donna; Lectora-Lara	Email	Other retroinsurer commutation information	Non-responsive
TIG	7270	7272	2/12/2004	Gilliland-Donna	Mesquita-Angel; Pascale-Bill; Lectora-Lara	Email	Other retroinsurer commutation information	Non-responsive
TIG	7270	7272				Spreadsheet	Other retroinsurer commutation information	Non-responsive
TIG	7270	7272	2/12/2004	Mesquita-Angel	Gilliland-Donna; Pascale-Bill; Gilliland-Donna; Lectora-Lara	Email	Other retroinsurer commutation information	Non-responsive
TIG	7270	7272	2/12/2004	Gilliland-Donna	Mesquita-Angel; Pascale-Bill; Lectora-Lara	Email	Other retroinsurer commutation information	Non-responsive
TIG	7316	7317	5/7/2004	Gilliland-Donna	Beaudoin-Nancy; DeMaria-Frank	Email with attachment	Other insured information	Non-responsive
TIG	7316	7317	12/09/2002			Spreadsheet	Other insured information	Non-responsive
TIG	7318	7320	5/7/2004	Gilliland-Donna	Beaudoin-Nancy; DeMaria-Frank	Email with attachment	Other insured information	Non-responsive
TIG	7318	7320	5/7/2004	DeMaria-Frank	Gilliland-Donna; Beaudoin-Nancy	Email with attachment	Other insured information	Non-responsive
TIG	7318	7320	12/09/2002			Spreadsheet	Other insured information	Non-responsive
TIG	7321	7323	5/7/2004	Gilliland-Donna	Beaudoin-Nancy; DeMaria-Frank	Email with attachment	Other insured information	Non-responsive
TIG	7321	7323	5/7/2004	DeMaria-Frank	Gilliland-Donna; Beaudoin-Nancy	Email with attachment	Other insured information	Non-responsive
TIG	7321	7323	12/09/2002			Spreadsheet	Other insured information	Non-responsive
TIG	7324	7326	5/6/2004	Gilliland-Donna	Bourne-Helen	Email	Other insured information	Non-responsive
TIG	7327	7338	5/24/2004	Gilliland-Donna	Nolan-Timothy; McClain-Richard	Email with attachment	Other insured information	Non-responsive
TIG	7335	7338				Spreadsheet	Other insured information	Non-responsive
TIG	7339	7351	5/24/2004	Gilliland-Donna	Nolan-Timothy; McClain-Richard	Email with attachment	Other insured information	Non-responsive
TIG	7349	7352				Spreadsheet	Other insured information	Non-responsive
TIG	7354	7357				Spreadsheet	Other insured information	Non-responsive
TIG	7355	7373	9/17/2004	Gilliland-Donna	Bourne-Helen	Email	Other insured information	Non-responsive
TIG	7355	7373	8/17/2004			Spreadsheet	Other insured information	Non-responsive
TIG	7374	7376	8/17/2004	Gilliland-Donna	Bourne-Helen	Email	Other insured information	Non-responsive
TIG	7377	7385	8/24/2004	Gilliland-Donna	Bourne-Helen	Email with attachment	Other insured information	Non-responsive
TIG	7379	7385	8/24/2004			Spreadsheet	Other insured information	Non-responsive
TIG	7387	7395	8/17/2004	Bourne-Helen	Gilliland-Donna	Email with attachment	Other insured information	Non-responsive



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Prefix	Begin Bates	End Bates	Date	Author	Recipients	Document Type	Subject of Redaction	Legal Basis for Withholding
TIG	8609	8615	10/25/2005	Gilliland-Donna	Michael-Darren; Short-Christopher; Hindley-David; Shah-Shreyas; Westover-Michael	Email	Other insured information	Non-responsive
TIG	8609	8615	10/28/2005	Michael-Darren	Gilliland-Donna; Short-Christopher; Hindley-David; Shah-Shreyas; Westover-Michael	Email	Other insured information	Non-responsive
TIG	8616	8651	10/25/2005	Gilliland-Donna	Michael-Darren; Short-Christopher; Hindley-David; Shah-Shreyas; Westover-Michael	Email	Other insured information	Non-responsive
TIG	8616	8651	10/26/2005	Michael-Darren	Gilliland-Donna; Short-Christopher; Hindley-David; Shah-Shreyas; Westover-Michael	Email	Other insured information	Non-responsive
TIG	8616	8651	10/26/2005	Gilliland-Donna	Michael-Darren; Short-Christopher; Hindley-David; Shah-Shreyas; Westover-Michael	Email	Other insured information	Non-responsive
TIG	8627	8651	2/28/2005	Gilliland-Donna	Michael-Darren; Short-Christopher; Hindley-David; Shah-Shreyas; Westover-Michael	Report	Other insured information	Non-responsive
TIG	8652	8660	10/25/2005	Gilliland-Donna	Michael-Darren; Short-Christopher; Hindley-David; Shah-Shreyas; Westover-Michael	Email	Other insured information	Non-responsive
TIG	8652	8660	10/26/2005	Michael-Darren	Gilliland-Donna; Short-Christopher; Hindley-David; Shah-Shreyas; Westover-Michael	Email	Other insured information	Non-responsive
TIG	8652	8660	10/26/2005	Gilliland-Donna	Michael-Darren; Short-Christopher; Hindley-David; Shah-Shreyas; Westover-Michael	Email	Other insured information	Non-responsive
TIG	8652	8660	10/27/2005	Gilliland-Donna	Michael-Darren; Short-Christopher; Hindley-David; Shah-Shreyas; Westover-Michael	Email	Other insured information	Non-responsive
TIG	8652	8660	10/27/2005	Michael-Darren	Gilliland-Donna; Short-Christopher; Hindley-David; Shah-Shreyas; Westover-Michael	Email	Other insured information	Non-responsive
TIG	8651	8665	11/14/2005	Michael-Darren	Gilliland-Donna; Short-Christopher; Hindley-David; Shah-Shreyas; Westover-Michael	Email with attachment	Other insured information	Non-responsive
TIG	8671	8675	11/14/2005	Michael-Darren	Gilliland-Donna; Short-Christopher; Hindley-David; Shah-Shreyas; Westover-Michael	Email with attachment	Other insured information	Non-responsive
TIG	8676	8681	11/14/2005	Michael-Darren	Gilliland-Donna; Short-Christopher; Hindley-David; Shah-Shreyas; Westover-Michael	Email with attachment	Other insured information	Non-responsive
TIG	8682	8685	11/14/2005	Michael-Darren	Gilliland-Donna; Short-Christopher; Hindley-David; Shah-Shreyas; Westover-Michael	Email	Other insured information	Non-responsive
TIG	8686	8690	11/14/2005	Michael-Darren	Gilliland-Donna; Short-Christopher; Hindley-David; Shah-Shreyas; Westover-Michael	Email	Other insured information	Non-responsive
TIG	8695	8699	11/17/2005	Gilliland-Donna	Brant-C; Westover-Michael	Email	Bank account number	Non-responsive
TIG	8691	8695	11/14/2005	Michael-Darren	Gilliland-Donna; Short-Christopher; Hindley-David; Shah-Shreyas; Westover-Michael	Email	Other insured information	Non-responsive
TIG	8691	8695	11/17/2005	Gilliland-Donna	Brant-C; Westover-Michael	Email	Bank account number	Non-responsive
TIG	8696	8708	11/14/2005	Michael-Darren	Gilliland-Donna; Short-Christopher; Hindley-David; Shah-Shreyas; Westover-Michael	Email	Other insured information	Non-responsive
TIG	8696	8708	11/17/2005	Gilliland-Donna	Brant-C; Westover-Michael	Email	Bank account number	Non-responsive
TIG	8709	8722	11/14/2005	Michael-Darren	Gilliland-Donna; Short-Christopher; Hindley-David; Shah-Shreyas; Westover-Michael	Email	Other insured information	Non-responsive
TIG	8709	8722	11/17/2005	Gilliland-Donna	Brant-C; Westover-Michael	Email	Bank account number	Non-responsive
TIG	8723	8737	11/14/2005	Michael-Darren	Gilliland-Donna; Short-Christopher; Hindley-David; Shah-Shreyas; Westover-Michael	Email	Other insured information	Non-responsive
TIG	8723	8737	11/17/2005	Gilliland-Donna	Brant-C; Westover-Michael	Email	Bank account number	Non-responsive
TIG	8747	8773	12/02/2005	Evans-PAB	Gilliland-Donna	Letter with attachments	Other insured information	Non-responsive
TIG	8774	8789	11/14/2005	Michael-Darren	Gilliland-Donna; Short-Christopher; Hindley-David; Shah-Shreyas; Westover-Michael	Email	Other insured information	Non-responsive
TIG	8774	8789	11/17/2005	Gilliland-Donna	Brant-C; Westover-Michael	Email	Bank account number	Non-responsive
TIG	8789	8794	12/13/2005	Gilliland-Donna	Brant-Chris	Email	Bank account number	Non-responsive
TIG	8795	8803	12/13/2005	Gilliland-Donna	Brant-Chris	Email	Bank account number	Non-responsive
TIG	8804	8812	12/13/2005	Gilliland-Donna	Brant-Chris	Email	Bank account number	Non-responsive

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Prefix	Begin Bates	End Bates	Date	Author	Recipients	Document Type	Subject of Reduction	Legal Basis for Withholding
TIG	8823	8828	4/24/2008	Gilliland-Donna	Westover-Michael	Report	Management Report	Non-responsive
TIG	8888	8930				Spreadsheet	Other insured information	Non-responsive
TIG	8931	8941	TIG			Spreadsheet	Other insured information	Non-responsive
TIG	8969	8988	3/16/2003			Spreadsheet	Other insured information	Non-responsive
TIG	8989		10/28/2003			Spreadsheet	Other insured information	Non-responsive
TIG	8970	8974				Spreadsheet	Other insured information	Non-responsive
TIG	8875	8989	10/25/2005			Spreadsheet	Other insured information	Non-responsive
TIG	8890	8995				Spreadsheet	Other insured information	Non-responsive
TIG	8938		10/4/2005			Spreadsheet	Other insured information	Non-responsive
TIG	9001	9001	10/7/2005			Spreadsheet	Other insured information	Non-responsive
TIG	8903	9047				Spreadsheet	Other insured information	Non-responsive
TIG	9048	9049				Spreadsheet	Other insured information	Non-responsive
TIG	9050	9065				Spreadsheet	Other insured information	Non-responsive
TIG	9066	9070				Spreadsheet	Other insured information	Non-responsive
TIG	9093					Spreadsheet	Other insured information	Non-responsive
TIG	9071	9102	04/09/2002			Spreadsheet	Other insured information	Non-responsive
TIG	9103	9123				Spreadsheet	Other insured information	Non-responsive
TIG	9124	9159	3/16/2003			Spreadsheet	Other insured information	Non-responsive
TIG	9160					Spreadsheet	Other insured information	Non-responsive
TIG	9506	9981				Spreadsheet	Other insured information	Non-responsive
TIG	9983	9983				Spreadsheet	Other insured information	Non-responsive
TIG	10428	10490				Spreadsheet	Other insured information	Non-responsive
TIG	10836	10844	12/03/2002			Spreadsheet	Other insured information	Non-responsive
TIG	11007	11017				Claim Form	Other insured information	Non-responsive
TIG	11023	11025				Spreadsheet	Other insured information	Non-responsive
TIG	11027		5/28/2002			Spreadsheet	Other insured information	Non-responsive
TIG	11029	11054				Spreadsheet	Other insured information	Non-responsive
TIG	11055	11059	5/28/2002	Cover-Paul		Email	Other insured information	Non-responsive
TIG	11080		5/30/2002		DeMarris-Frank, Langridge-Mark	Spreadsheet	Other insured information	Non-responsive
TIG	11081		5/30/2002			Spreadsheet	Other insured information	Non-responsive
TIG	11082		5/17/2002			Spreadsheet	Other insured information	Non-responsive
TIG	11085	11113				Spreadsheet	Other insured information	Non-responsive
TIG	11114	11123	5/1/2002			Spreadsheet	Other insured information	Non-responsive
TIG	11129	11151				Spreadsheet	Other insured information	Non-responsive
TIG	11132		12/00/2002			Spreadsheet	Other insured information	Non-responsive
TIG	11133		12/00/2002			Spreadsheet	Other insured information	Non-responsive
TIG	11134		12/00/2003			Spreadsheet	Other insured information	Non-responsive
TIG	11139	11144	12/09/2005	Evans-PAB	Gilliland-Donna	Letter with attachments	Other insured information	Non-responsive
TIG	11349					Spreadsheet	Other insured information	Non-responsive
TIG	11350	11422				Status Reports	Other insured information	Non-responsive
TIG	11423					Analysis	Other insured information	Non-responsive
TIG	11424	11426	6/30/2005			Spreadsheet	Other insured information	Non-responsive
TIG	11450	11459				Agreement	Other insured information	Non-responsive
TIG	11534	11567	11/4/2005	Michaels-Darren	Gilliland-Donna, Westover-Michael, Hindley-David, Short-Christopher, Shah-Shreyas	Email	Other insured information	Non-responsive
TIG	11554	11567	11/17/2005	Gilliland-Donna	Brant-Chris, Westover-Michael	Email	Bank account number	Non-responsive
TIG	11568	11580	11/4/2005	Michaels-Darren	Gilliland-Donna, Westover-Michael, Hindley-David, Short-Christopher, Shah-Shreyas	Email	Other insured information	Non-responsive
TIG	11568	11584	11/17/2005	Michaels-Darren	Brant-Chris, Westover-Michael	Email	Bank account number	Non-responsive
TIG	11584	11584	11/4/2005	Michaels-Darren	Gilliland-Donna, Westover-Michael, Hindley-David, Short-Christopher, Shah-Shreyas	Email	Other insured information	Non-responsive

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**TIG Insurance Company's Redaction Log**  
in the matter of All Insurance Company v. TIG Insurance Company

Prefix	Begin Dates	End Dates	Date	Author	Recipients	Document Type	Subject of Redaction Bank account number.	Legal Basis for Withholding
TIG	11/591	11/584	11/17/2005	Gilliland-Donna	Brian-Chris; Westover-Michael	Email	Bank account number.	Non-responsive
TIG	11/585	11/587	11/14/2005	Michaels-Darren	Gilliland-Donna; Westover-Michael; Hindley-David; Short-Christopher; Shah-Shreyas	Email	Other insured information	Non-responsive
TIG	11/593	11/599	10/25/2005	Gilliland-Donna	Darvid; Shah-Shreyas; Westover-Michael	Email	Other insured information	Non-responsive
TIG	11/593	11/599	10/26/2005	Michaels-Darren	Gilliland-Donna; Short-Christopher; Hindley-David; Shah-Shreyas; Westover-Michael	Email	Other insured information	Non-responsive
TIG	11/593	11/599	10/26/2005	Gilliland-Donna	Michael-Darren; Short-Christopher; Hindley-David; Shah-Shreyas; Westover-Michael	Email	Other insured information	Non-responsive
TIG	11/593	11/599	10/27/2005	Gilliland-Donna	Michael-Darren; Short-Christopher; Hindley-David; Shah-Shreyas; Westover-Michael	Email	Other insured information	Non-responsive
TIG	11/600	11/606	10/25/2005	Gilliland-Donna	Michael-Darren; Short-Christopher; Hindley-David; Shah-Shreyas; Westover-Michael	Email	Other insured information	Non-responsive
TIG	11/600	11/606	10/26/2005	Michaels-Darren	Gilliland-Donna; Short-Christopher; Hindley-David; Shah-Shreyas; Westover-Michael	Email	Other insured information	Non-responsive
TIG	11/600	11/607	10/26/2005	Gilliland-Donna	Darvid; Shah-Shreyas; Westover-Michael	Spreadsheet	Other insured information	Non-responsive
TIG	11/608	11/642	10/25/2005	Gilliland-Donna	Michael-Darren; Short-Christopher; Hindley-David; Shah-Shreyas; Westover-Michael	Email with attachment	Other insured information	Non-responsive
TIG	11/613	11/642	10/25/2005	Gilliland-Donna	Darvid; Shah-Shreyas; Westover-Michael	Spreadsheet	Other insured information	Non-responsive
TIG	11/643	11/656	10/21/2005	Gilliland-Donna	Michaels-Darren	Notes	Other insured information	Non-responsive
TIG	11/654	11/656	10/14/2005	Gilliland-Donna	Michaels-Darren	Letter	Other insured information	Non-responsive
TIG	11/735	11/735	6/17/2005	TIG		Spreadsheet	Other insured information	Non-responsive
TIG	11/743	11/743	6/17/2005	TIG		Spreadsheet	Other insured information	Non-responsive
TIG	11/770	11/772	13/2/2003	Parker-John	DeMaria-Frank	Spreadsheet	Other insured information	Non-responsive
TIG	11/832	11/824	3/24/2003			Hardwritten Notes	Commodity assessment analysis	Attorney-client privilege
TIG	11/826	11/826	1/11/2006			Agreement	Other insured information	Non-responsive
TIG	11/827	11/827	06/30/2006			Notes	Other insured information	Non-responsive
TIG	11/828	11/829	8/30/2003			Spreadsheet	Other insured information	Non-responsive
TIG	11/830	11/857	8/02/2003			Spreadsheet	Other insured information	Non-responsive
TIG	11/938	11/941	12/21/2004			Notes	Other insured information	Non-responsive
TIG	11/941	11/941	03/03/2005			Notes	Other insured information	Non-responsive
TIG	11/947	11/961	12/31/2005			Spreadsheet	Other insured information	Non-responsive
TIG	11/964	11/964	12/31/2005			Spreadsheet	Other insured information	Non-responsive
TIG	11/965	11/965	12/31/2005			Spreadsheet	Other insured information	Non-responsive
TIG	11/966	11/966	12/28/2005	Evans-PAB	Gilliland-Donna	Spreadsheet	Other insured information	Non-responsive
TIG	11/993	12/001	12/02/2002			Letter with attachments	Other insured information	Non-responsive
TIG	12/016	12/029	5/23/2006	Evans-PAB	Gilliland-Donna	Spreadsheet	Other insured information	Non-responsive
TIG	12/049	12/049	TIG			Notes	Other insured information	Non-responsive
TIG	12/050	12/054	5/7/2004	Gilliland-Donna	Beaudoin-Nancy; DeMaria-Frank	Email with attachment	Other insured information	Non-responsive
TIG	12/050	12/054	5/7/2004	DeMaria-Frank	Gilliland-Donna; Beaudoin-Nancy	Email	Other insured information	Non-responsive
TIG	12/050	12/054	TIG			Spreadsheet	Other insured information	Non-responsive
TIG	12/055	12/059	12/02/2002			Spreadsheet	Other insured information	Non-responsive
TIG	12/069	TIG				Hardwritten Notes	Other insured information	Non-responsive
TIG	12/100	12/101	6/1/2005	Apollon-Dan	Gilliland-Donna	Email	Other insured information	Non-responsive
TIG	12/088	12/089	6/1/2005	Apollon-Dan	Gilliland-Donna	Email	Other insured information	Non-responsive
TIG	12/098	12/099	6/1/2005	Apollon-Dan	Gilliland-Donna	Email	Other insured information	Non-responsive
TIG	12/094	12/093	6/1/2005	Apollon-Dan	Gilliland-Donna	Email	Other insured information	Non-responsive

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**TIG Insurance Company's Redaction Log**  
in the matter of AUI Insurance Company v. TIG Insurance Company

Prefix	Begin Bates	End Bates	Date	Author	Recipients	Document Type	Subject of Redaction	Legal Basis for Withholding
TIG	12094	12097	6/12/2005	Galland-Donna	Apollon-Dan	Email	Other insured information	Non-responsive
TIG	12094	12097	6/22/2005	Apollon-Dan	Galland-Donna	Email	Other insured information	Non-responsive
TIG	12094	12097	6/22/2005	Galland-Donna	Apollon-Dan	Email	Other insured information	Non-responsive
TIG	12103	12117	12/29/2005	Galland-Donna	Legge-Robin	Letter with attachments	Bank account number	Non-responsive
TIG	12111	12117				Spreadsheets	Other insured information	Non-responsive
TIG	12336	12492				Binder	Other insured information	Non-responsive
TIG	12653	12677				Certificate of Reinsurance	Other insured information	Non-responsive
TIG	12684	12691	10/7/1980			Certificate of Reinsurance	Other insured information	Non-responsive
TIG	12692	12695	10/7/1980			Certificate of Reinsurance	Other insured information	Non-responsive
TIG	12696	12697	10/6/1980			Certificate of Reinsurance	Other insured information	Non-responsive
TIG	12698	12697	4/21/1979			Certificate of Reinsurance	Other insured information	Non-responsive
TIG	12908	12917	4/21/1979			Certificate of Reinsurance	Other insured information	Non-responsive
TIG	12918	12925	10/7/1980			Certificate of Reinsurance	Other insured information	Non-responsive
TIG	12926	12928	10/7/1980			Certificate of Reinsurance	Other insured information	Non-responsive
TIG	12930	12931	10/6/1980			Certificate of Reinsurance	Other insured information	Non-responsive
TIG	12932	12936	10/16/1979			Certificate of Reinsurance	Other insured information	Non-responsive
TIG	12939	12945	11/8/1979			Certificate of Reinsurance	Other insured information	Non-responsive
TIG	12987		6/18/1981			Handwritten Notes	W. Pascale communication re legal analysis and assessment of AUI audit	Attorney work product doctrine
TIG	13208					Handwritten Notes	W. Pascale communication re matter legal assessment and strategy	Attorney-client privilege, Attorney work product doctrine
TIG	13277		4/17/1980			Handwritten Notes	W. Pascale communication re matter legal assessment and strategy	Attorney-client privilege, Attorney work product doctrine
TIG	13514	13515				Handwritten Notes	W. Pascale communication re matter legal assessment and strategy	Attorney-client privilege, Attorney work product doctrine
TIG	13585					Handwritten Notes	W. Pascale communication re matter legal assessment and strategy	Attorney-client privilege, Attorney work product doctrine
TIG	13589		9/17/1981			Handwritten Notes	Other retro information	Non-responsive
TIG	13646		10/27/1980			Handwritten Notes	Other retro information	Non-responsive
TIG	13762		6/22/2007	Pascale-Bill	Katlar-Richard	Email	Redaction is of box to counsel	Attorney-client privilege
TIG	13924		6/22/2007	Pascale-Bill	Katlar-Richard	Email	Redaction is of box to counsel	Attorney-client privilege
TIG	13928		6/28/2007	Pascale-Bill	Katlar-Richard	Email	Redaction is of box to counsel	Attorney-client privilege
TIG	13946		7/6/2007	Pascale-Bill	Katlar-Richard	Email	Redaction is of box to counsel	Attorney-client privilege
TIG	13993		8/22/2007	Staley-Michael		Progress Note	Communication re legal analysis and assessment of AUI audit	Attorney-client privilege, attorney work product doctrine
TIG	14002		8/32/2007	Staley-Michael		Progress Note	Communication re legal analysis and assessment of AUI audit	Attorney-client privilege, attorney work product doctrine
TIG	14011		8/32/2007	Staley-Michael		Progress Note	Communication re legal analysis and assessment of AUI audit	Attorney-client privilege, attorney work product doctrine
TIG	14020		8/32/2007	Staley-Michael		Progress Note	Communication re legal analysis and assessment of AUI audit	Attorney-client privilege, attorney work product doctrine
TIG	14032		8/32/2007	Staley-Michael		Progress Note	Communication re legal analysis and assessment of AUI audit	Attorney-client privilege, attorney work product doctrine
TIG	14110		8/32/2007	Staley-Michael		Progress Note	Communication re legal analysis and assessment of AUI audit	Attorney-client privilege, attorney work product doctrine
TIG	14112		8/32/2007	Staley-Michael		Progress Note	Communication re legal analysis and assessment of AUI audit	Attorney-client privilege, attorney work product doctrine
TIG	14113		8/32/2007	Staley-Michael		Progress Note	Communication re legal analysis and assessment of AUI audit	Attorney-client privilege, attorney work product doctrine

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Prefix	Begin Bates	End Bates	Date	Author	Recipients	Document Type	Subject of Redaction	Legal Basis for Withholding
TIG	14114		8/3/2007	Staley-Michael		Progress Note	Communication re legal analysis and assessment of AU audit	Attorney-client privilege; Attorney work product doctrine
TIG	14115		8/3/2007	Staley-Michael		Progress Note	Communication re legal analysis and assessment of AU audit	Attorney-client privilege; Attorney work product doctrine
TIG	14116		8/3/2007	Staley-Michael		Progress Note	Communication re legal analysis and assessment of AU audit	Attorney-client privilege; Attorney work product doctrine
TIG	14117		8/3/2007	Staley-Michael		Progress Note	Communication re legal analysis and assessment of AU audit	Attorney-client privilege; Attorney work product doctrine
TIG	14118		8/3/2007	Staley-Michael		Progress Note	Communication re legal analysis and assessment of AU audit	Attorney-client privilege; Attorney work product doctrine
TIG	14127		8/3/2007	Staley-Michael		Progress Note	Communication re legal analysis and assessment of AU audit	Attorney-client privilege; Attorney work product doctrine
TIG	14136		8/3/2007	Staley-Michael		Progress Note	Communication re legal analysis and assessment of AU audit	Attorney-client privilege; Attorney work product doctrine
TIG	14147		8/3/2007	Staley-Michael		Progress Note	Communication re legal analysis and assessment of AU audit	Attorney-client privilege; Attorney work product doctrine
TIG	14284		4/27/2007	Staley-Michael	Rubin-James; Parker-John; Pascale-Bill	Email	Request for legal advice re matter legal assessment and strategy	Attorney-client privilege
TIG	14425		5/15/2007	Staley-Michael	Kate-Richard; Pascale-Bill; Parker-John	Email	Redaction of Doc to Counsel	Attorney-client privilege
TIG	14567		6/25/2007	Staley-Michael	Pascale-Bill; Parker-John	Email	Communication re matter legal assessment and strategy	Attorney work product doctrine
TIG	14586					Notes	A. Walker's communication re legal analysis and assessment of AU audit	Attorney work product doctrine
TIG	14601					File Folder	Other insured information	Non-responsive
TIG	14602					Notes	Other insured information	Non-responsive
TIG	14609					Notes	Other insured information	Non-responsive
TIG	14694					Notes	Other insured information	Non-responsive
TIG	14779					Handwritten Notes	Other insured information	Non-responsive
TIG	14812		12/15/1981			Spreadsheet	Other insured information	Non-responsive
TIG	14830	14863	10/14/2005	Giliand-Donna	Michaels-Darren	Letter with attachments	Other insured information	Non-responsive
TIG	14833	14863				Spreadsheets	Other insured information	Non-responsive
TIG	14869	14872	4/24/2006			Report	Management Report	Non-responsive
TIG	14908	14910				Spreadsheet	Other insured information	Objection
TIG	14912					List	Other insured information	Non-responsive
TIG	14915	14918				Spreadsheet	Other insured information	Non-responsive
TIG	14919	14922				Spreadsheet	Other insured information	Non-responsive
TIG	14923	14928				Spreadsheet	Other insured information	Non-responsive
TIG	14929	14943				Spreadsheet	Other insured information	Non-responsive
TIG	14944	14970				Spreadsheet	Other insured information	Non-responsive
TIG	14972	14985				Spreadsheet	Other insured information	Non-responsive
TIG	14986	15009				Spreadsheet	Other insured information	Non-responsive
TIG	15020	15077				Spreadsheet	Other insured information	Non-responsive
TIG	15028	15030				Spreadsheet	Other insured information	Non-responsive
TIG	15031					Spreadsheet	Other insured information	Non-responsive
TIG	15032	15114	4/23/2002			Spreadsheet	Other insured information	Non-responsive
TIG	15116		4/23/2002			Analysis	Other insured information	Non-responsive
TIG	15117		4/23/2002			Analysis	Other insured information	Non-responsive
TIG	15119		4/23/2002			Analysis	Other insured information	Non-responsive
TIG	15121		4/4/2002			Analysis	Other insured information	Non-responsive
TIG	15122		4/4/2002			Analysis	Other insured information	Non-responsive
TIG	15124		4/4/2002			Analysis	Other insured information	Non-responsive
TIG	15126		4/27/2002			Analysis	Other insured information	Non-responsive

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Prefix	Begin Bates	End Bates	Date	Author	Recipients	Document Type	Subject of Redaction	Legal Basis for Withholding
TIG	15127		6/30/2001			Analysis	Other insured information	Non-responsive
TIG	15129		6/30/2001			Analysis	Other insured information	Non-responsive
TIG	15131	15136	3/31/2001			Spreadsheet	Other insured information	Non-responsive
TIG	15140	15159	8/10/2001			Spreadsheet	Other insured information	Non-responsive
TIG	15160	15168	9/21/2001			Spreadsheet	Other insured information	Non-responsive
TIG	15171		7/11/2001			Spreadsheet	Other insured information	Non-responsive
TIG	15172					Notes	Other insured information	Non-responsive
TIG	15174	15184	3/31/2001			Spreadsheet	Other insured information	Non-responsive
TIG	15195	15215	8/10/2001			Spreadsheet	Other insured information	Non-responsive
TIG	15216	15218	8/21/2001			Spreadsheet	Other insured information	Non-responsive
TIG	15219		8/22/2001			Notes	Other insured information	Non-responsive
TIG	15221					Notes	Other insured information	Non-responsive
TIG	15222		8/28/2001			Spreadsheet	Other insured information	Non-responsive
TIG	15223		8/28/2001			Spreadsheet	Other insured information and other retro information	Non-responsive
TIG	15224	15239				File	Other insured information	Non-responsive
TIG	15242	15249				Letter	Other insured information	Non-responsive
TIG	15259					Spreadsheet	Other insured information	Non-responsive
TIG	15260					Analysis	Other insured information and other retro information	Non-responsive
TIG	15261		9/5/2001			Analysis	Other insured information	Non-responsive
TIG	15268	15271	11/21/2002			Analysis	Other insured information	Non-responsive
TIG	15272					Analysis	Other insured information	Non-responsive
TIG	15273					Analysis	Other insured information	Non-responsive
TIG	15274	15278				Report	Other insured information	Non-responsive
TIG	15287		6/30/2001			Analysis	Other insured information	Non-responsive
TIG	15288		6/30/2001			Analysis	Other insured information	Non-responsive
TIG	15290		6/30/2001			Analysis	Other insured information	Non-responsive
TIG	15293		11/2/2001			Analysis	Other insured information	Non-responsive
TIG	15301		12/21/2001			Email	Other insured information	Non-responsive
TIG	15331					Spreadsheet	Other insured information	Non-responsive
TIG	15332	15366				Analysis	Other insured information	Non-responsive
TIG	15367	15375	12/4/2000			Spreadsheet	Other insured information	Non-responsive
TIG	15376	15383				Notes	Other insured information	Non-responsive
TIG	15385	15387	8/1/2001			Spreadsheet	Other insured information	Non-responsive
TIG	15396	15408				Spreadsheet	Other insured information	Non-responsive
TIG	15417	15438	12/31/2002			Spreadsheet	Other insured information	Non-responsive
TIG	15439	15446				Spreadsheet	Other insured information	Non-responsive
TIG	15447	15450	06/00/2003			Spreadsheet	Other insured information	Non-responsive
TIG	15454	15472				Spreadsheet	Other insured information	Non-responsive
TIG	15473	15497	5/31/2003			Spreadsheet	Other insured information	Non-responsive
TIG	15498	15533				Spreadsheet	Other insured information	Non-responsive
TIG	15534	15542	10/1/2003			Proposal	Other insured information	Non-responsive
TIG	15543	15552	1/20/2003			Analysis	Other insured information	Non-responsive
TIG	15553	15588	6/16/2003			Spreadsheet	Other insured information	Non-responsive
TIG	15589	15613	5/16/2003			Spreadsheet	Other insured information	Non-responsive
TIG	15634	15637	8/5/2001			Proposal	Other insured information	Non-responsive
TIG	15640	15644	3/31/2001			Spreadsheet	Other insured information	Non-responsive
TIG	15645	15646				Spreadsheet	Other insured information	Non-responsive
TIG	15647		3/31/2001			Spreadsheet	Other insured information	Non-responsive
TIG	15648					Spreadsheet	Other insured information	Non-responsive
TIG	15651	15677	8/28/2001			Spreadsheet	Other insured information	Non-responsive
TIG	15763	15764	8/27/2001			Spreadsheet	Other insured information	Non-responsive

**TIG Insurance Company's Redaction Log**  
in the matter of All Insurance Company v. TIG Insurance Company

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Prefix	Begin Bates	End Bates	Date	Author	Recipients	Document Type	Subject of Redaction	Legal Basis for Withholding
TIG	15766	15784	8/6/2001			Spreadsheet	Other insured information	Non-responsive
TIG	15785	15804				Spreadsheet	Other insured information	Non-responsive
TIG	15805	15824				Spreadsheet	Other insured information	Non-responsive
TIG	15825	15910	04/02/2002			Presentation	Other insured information	Non-responsive
TIG	15911	15913	2/12/2007			Report	Communication re matter legal assessment and strategy	Attorney work product doctrine
TIG	15914	15916	4/9/2007			Report	Communication re matter legal assessment and strategy	Attorney work product doctrine

## In the matter of AIU Insurance Company v. TIG Insurance Company

Individual Listed on Log	Attorney/Non-Attorney	Title/Department Attorneys	Employer Entity on Date of Communication
Alvino-Ginamarie	Non-Attorney		Riverstone
Baldwin-Sara	Non-Attorney		Riverstone
Beaudoin-Nancy	Non-Attorney		Riverstone
Becker-Jones-Clive	Non-Attorney		Riverstone
Belcove-Ira	Attorney	Partner	Butler Rubin Saltarelli & Boyd
DeMarla-Frank	Non-Attorney		Riverstone
Falk-Steve	Non-Attorney		Riverstone
Fornwall-Kelly	Non-Attorney		Butler Rubin Saltarelli & Boyd
Gilliand-Donna	Non-Attorney		Riverstone
Goepfert-Kurt	Non-Attorney		Riverstone
Gossett-Bob	Non-Attorney		Riverstone
Hall-Jennifer	Non-Attorney		Buxbaum Loggia
Hanna-Michael	Non-Attorney		Riverstone
Hermes-Bob	Attorney	Partner	Butler Rubin Saltarelli & Boyd
Isely-Catherine	Attorney	Partner	Butler Rubin Saltarelli & Boyd
LeBlanc-Sandra	Non-Attorney		Riverstone
LeGros-Christopher	Non-Attorney		Riverstone
Lemire-Maureen	Non-Attorney		Riverstone
Loggia-Joe	Non-Attorney		Buxbaum Loggia
McCarthy-Linda	Non-Attorney		Riverstone
Meier-Renee	Non-Attorney		Riverstone
	Attorney	Senior Vice President - Reinsurance Reinsurance Counsel	
Parker-John			Riverstone
Pascale-Bill	Non-Attorney		Riverstone
Pines-Amy	Attorney	Associate	Butler Rubin Saltarelli & Boyd
Rubin-James	Attorney	Partner	Butler Rubin Saltarelli & Boyd
Salvatore-Carole	Non-Attorney		Riverstone
Shiffer-Kristina	Non-Attorney		Riverstone
Staley-Michael	Non-Attorney		Riverstone
Stelmach-Doreen	Non-Attorney		Riverstone
Thibodeau-Elizabeth	Non-Attorney		Riverstone
	Attorney	Assistant Vice President Deputy Reinsurance Counsel	
Weikers-Ann			Riverstone
Weitzner-Steve	Non-Attorney		Buxbaum Loggia
Westover-Michael	Non-Attorney		Riverstone